

## Members' Library Service Request Form

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Document Title	SESplan Supplementary Guidance on Housing Land

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East Lothian Council
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Designation	Head of Development
Date	26/03/14

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Date Received	26/03/14
Bulletin	Mar14

**REPORT TO:** Members' Library Service

**MEETING DATE:**

**BY:** Depute Chief Executive (Partnerships and Services for Communities)

**SUBJECT:** SESplan Supplementary Guidance on Housing Land

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## **1 PURPOSE**

- 1.1 To provide for members' information a report by the Strategic Development Plan Manager on SESplan's *Supplementary Guidance on Housing Land*, approved at the SESplan Joint Committee meeting on 10 March 2014.

## **2 RECOMMENDATIONS**

- 2.1 Members are asked to note the attached report by the SDP Manager to the SESplan Joint Committee of 10 March 2014 seeking approval for Supplementary Guidance on Housing Land and for its subsequent ratification by each of the six SESplan member authorities.

## **3 BACKGROUND**

- 3.1 A report will be presented to East Lothian Council's meeting on the 22 April 2014 recommending ratification of SESplan's decision to approve Supplementary Guidance on Housing Land for submission to Scottish Ministers. The Strategic Development Plan Manager's report summarises the consultation response to the draft Guidance, details the main issues raised and outlines SESplan's response to the responses received.

## **4 POLICY IMPLICATIONS**

- 4.1 None

## **5 EQUALITIES IMPACT ASSESSMENT**

- 5.1 This report is not applicable to the well being of equalities groups and an Equalities Impact Assessment is not required.

## **6 RESOURCE IMPLICATIONS**

- 6.1 Financial - none  
6.2 Personnel - none  
6.3 Other - none

## **7 BACKGROUND PAPERS**

- 7.1 SESplan Supplementary Guidance – Housing Land, Consultation Draft, November 2013

<b>AUTHOR'S NAME</b>	Ian Glen	
<b>DESIGNATION</b>	Policy & Projects Manager	
<b>CONTACT INFO</b>	01620 827395    iglen@eastlothian.gov.uk	
<b>DATE</b>	26 March 2014	

For Decision	✓
For Information	

## ITEM 6 – SUPPLEMENTARY GUIDANCE

Report by: Ian Angus, SDP Manager

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### PURPOSE

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This Report has been prepared to:

- Inform the SESplan Joint Committee of the consultation responses received, the main issues raised and the SESplan responses to the responses received on the draft Supplementary Guidance on Housing Land;
- Seek SESplan Joint Committee approval of minor editorial changes of a non policy nature to the draft Supplementary Guidance and accompanying documents;
- Seek SESplan Joint Committee approval to submit the Supplementary Guidance to Scottish Ministers for consideration;
- Inform the SESplan Joint Committee that member authorities will be required to ratify the minor editorial changes and the decision to submit the Supplementary Guidance to Scottish Ministers and adopt the Guidance following the expiration of the 28 day Ministerial consideration period; and
- Inform the SESplan Joint Committee of the findings of the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) of the Supplementary Guidance.

### RECOMMENDATIONS

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It is recommended that the SESplan Joint Committee:

1. Notes the summaries of the consultation responses received on the Draft Supplementary Guidance on Housing Land attached as Appendix A to this Report;

2. Notes the summaries of the main issues raised by the consultation responses and the SESplan responses attached as Appendix B to this Report;
3. Approves the editorial changes of a non policy nature to the draft Supplementary Guidance on Housing Land, attached as Appendix C to this Report;
4. Approves the draft Supplementary Guidance on Housing Land subject to the minor editorial changes outlined in Recommendation 3 for submission to Scottish Ministers;
5. Requests that the Member Authorities ratify the editorial changes at Recommendation 3 and the decision to submit to Scottish Ministers at Recommendation 4 and adopt the Supplementary Guidance on Housing Land at the expiration of the 28 day Ministerial consideration period unless Scottish Ministers direct otherwise;
6. Notes the updated Strategic Environmental Assessment (SEA) Environmental Report attached as Appendix D to this Report; and
7. Notes the Habitats Regulations Assessment (HRA) of the potential impacts on European Sites from the Supplementary Guidance attached as Appendix E to this Report.

## **RESOURCE IMPLICATIONS**

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As set out below.

## **LEGAL AND RISK IMPLICATIONS**

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All risks are detailed in the SESplan Risk Register and reported to Joint Committee on an annual basis.

## **POLICY AND IMPACT ASSESSMENT**

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No separate impact assessment is required.

### **1. BACKGROUND**

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- 1.1 In approving the Strategic Development Plan (SDP) on the 27 June 2013, Scottish Ministers made modifications to Policy 5 (Housing Land).

- 1.2 The modifications require Supplementary Guidance to be prepared to provide further detailed information for Local Development Plans (LDPs) as to how much of the overall housing land requirement should be met in each of the six member authority areas (City of Edinburgh, East Lothian, Fife (southern part of Fife only), Midlothian, Scottish Borders and West Lothian) in the periods 2009 - 2019 and 2019 - 2024.
- 1.3 As set out in the SDP approval letter (available for download from the Directorate for Planning and Environmental Appeals website (<http://www.dpea.scotland.gov.uk/CaseDetails.aspx?id=qA313854>), Scottish Ministers expect the Supplementary Guidance to be adopted within 12 months from the date of approval of the SDP. The Guidance must therefore be adopted by no later than the 27 June 2014.

## 2. THE CONSULTATION

- 2.1 At its meeting on the 30 September 2013, the SESplan Joint Committee approved the draft Supplementary Guidance for ratification and thereafter publication. The document was formally published on the SESplan Consultation Portal (<http://sesplan-consult.objective.co.uk/portal>) for a six week period on the 12 November 2013.

### The Questions / Number of Respondents

- 2.2 The Consultation on the draft Supplementary Guidance posed seven questions and a total of 167 Consultees responded, raising 583 responses. Responses were received as follows.

Question	No of Responses Received
1 Do you agree that the Supplementary Guidance complies with Scottish Planning Policy? If not, why not? In what way does the Guidance need to change in order to comply with Scottish Planning Policy?	80

Question	No of Responses Received
2 Do you agree that the distribution of the housing land requirement across each of the six Member Authority areas set out in Table 3.1 is justified? Do you have any further comments on the distribution of the housing land requirement set out in Table 3.1 of the Supplementary Guidance?	87
3 Do you agree with the breakdown by Strategic Development Area as shown in Table 3.2 of the Supplementary Guidance? Do you have any further comments on the additional allowances by Strategic Development Area set out in Table 3.2 of the Supplementary Guidance?	81
4 Do you agree with the additional allowances outwith Strategic Development Areas as shown in Table 3.2 of the Supplementary Guidance? Do you have any further comments on the additional allowances outwith Strategic Development Areas set out in Table 3.2 of the Supplementary Guidance?	70
5 Is the distribution of the housing land requirement including additional allowances, over the period to 2024, shown in Tables 3.1 and 3.2 of the Supplementary Guidance, deliverable? Please set out any comments.	72
6 What can SESplan, the key agencies, developers and Scottish Government do to facilitate delivery of the strategic housing land requirement?	73
7 Are there any further comments on the draft Supplementary Guidance you would like us to consider?	120
<b>Total Responses</b>	<b>583</b>

2.3 A summary of all responses received is attached as Appendix A to this Report. The full responses are available to view and download on the SESplan Consultation Portal (<http://sesplan-consult.objective.co.uk/portal/sq/hsgland?tab=list>).

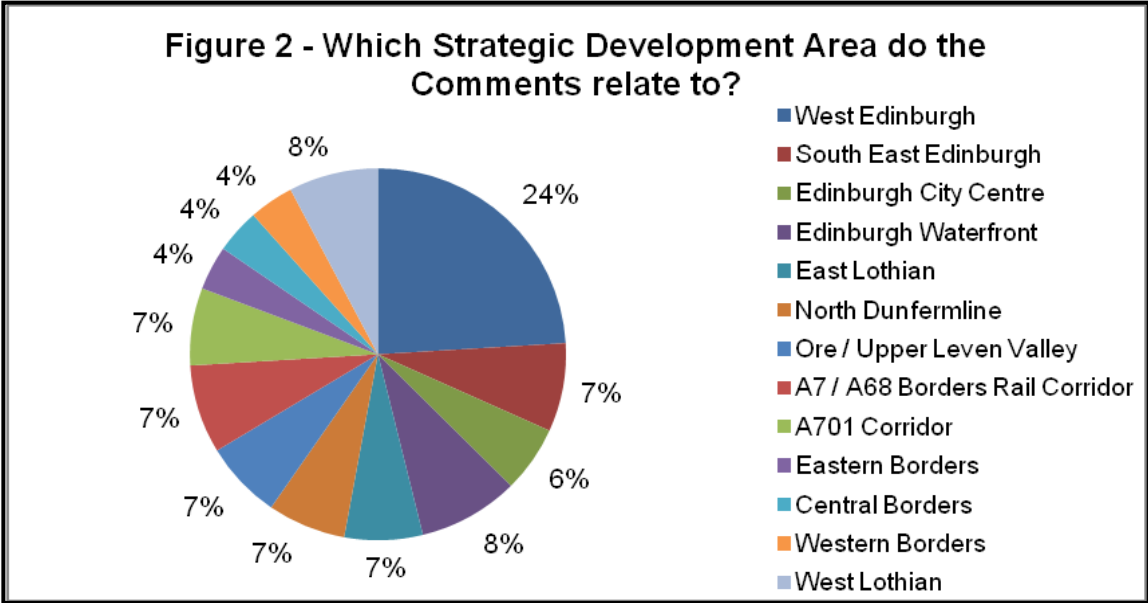
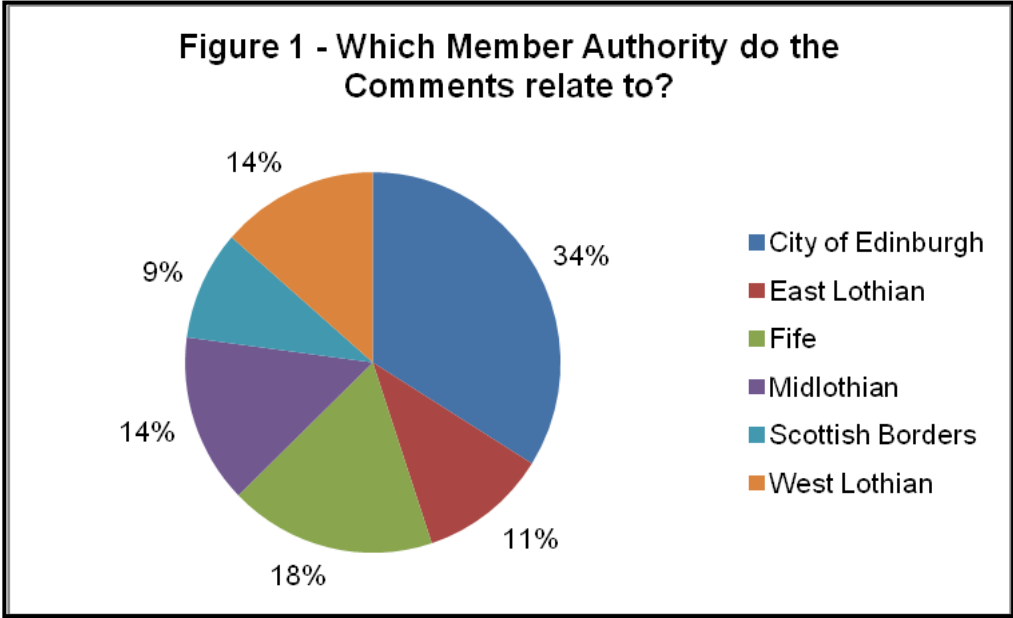
### The Responses in Summary

2.4 There was a wide range of Consultees who responded including key agencies, individuals, community councils, developers, planning agents and landowners.

- 2.5 All respondents to Questions 1, 2 and 3 were asked to initially vote yes / no as to whether the Supplementary Guidance complies with Scottish Planning Policy (SPP) (Question 1) and whether they agreed with Tables 3.1 (Question 2) and 3.2 (Question 3) before being asked to provide comments to explain their answers.
- 2.6 An initial analysis of the yes / no responses shows that the majority of respondees to these questions do not think that the Supplementary Guidance complies with SPP. Nor do they agree with the contents of Tables 3.1 and 3.2. However, a fuller analysis of the comments received (and the summaries set out within Appendix A) shows that there are many opposing views which result in a 'no' response. This could be representative of opposing positions reflecting public / community and development industry views on housing development.
- 2.7 For Question 1, many individual and community groups feel that the Guidance does not comply with SPP because pursuing the delivery of the housing requirement on greenfield and green belt land and at locations which they consider unsustainable will be to the detriment the Government's and SESplan's sustainable goals and aims. It is felt that the delivery of brownfield sites should be prioritised and incentivised. This is the opposite of what many developers and landowners responses state in that more greenfield and green belt sites in or near Edinburgh are required to meet need and demand where it arises.
- 2.8 The divergence of qualifying comments to Questions 2 and 3 were similar. Some community groups and individuals state that the requirements and allowances were too high, undeliverable and would result in detrimental environmental impacts and overstretched infrastructure. Whereas many developers and landowners felt that the requirements and allowances were too low with some submitting further information on particular site interests. Furthermore these groups considered that existing strategic sites should not be relied upon since they will not deliver. Many felt that Edinburgh could accommodate more development than required by Table 3.1.



2.9 Respondents on Questions 2 and 3 were also asked which Member Authority area and which Strategic Development Area (SDA) the comments relate to. The majority of respondents as detailed in Figures 1 and 2 below indicated that their comments related to Edinburgh (34%) and to the West Edinburgh SDA (24%).

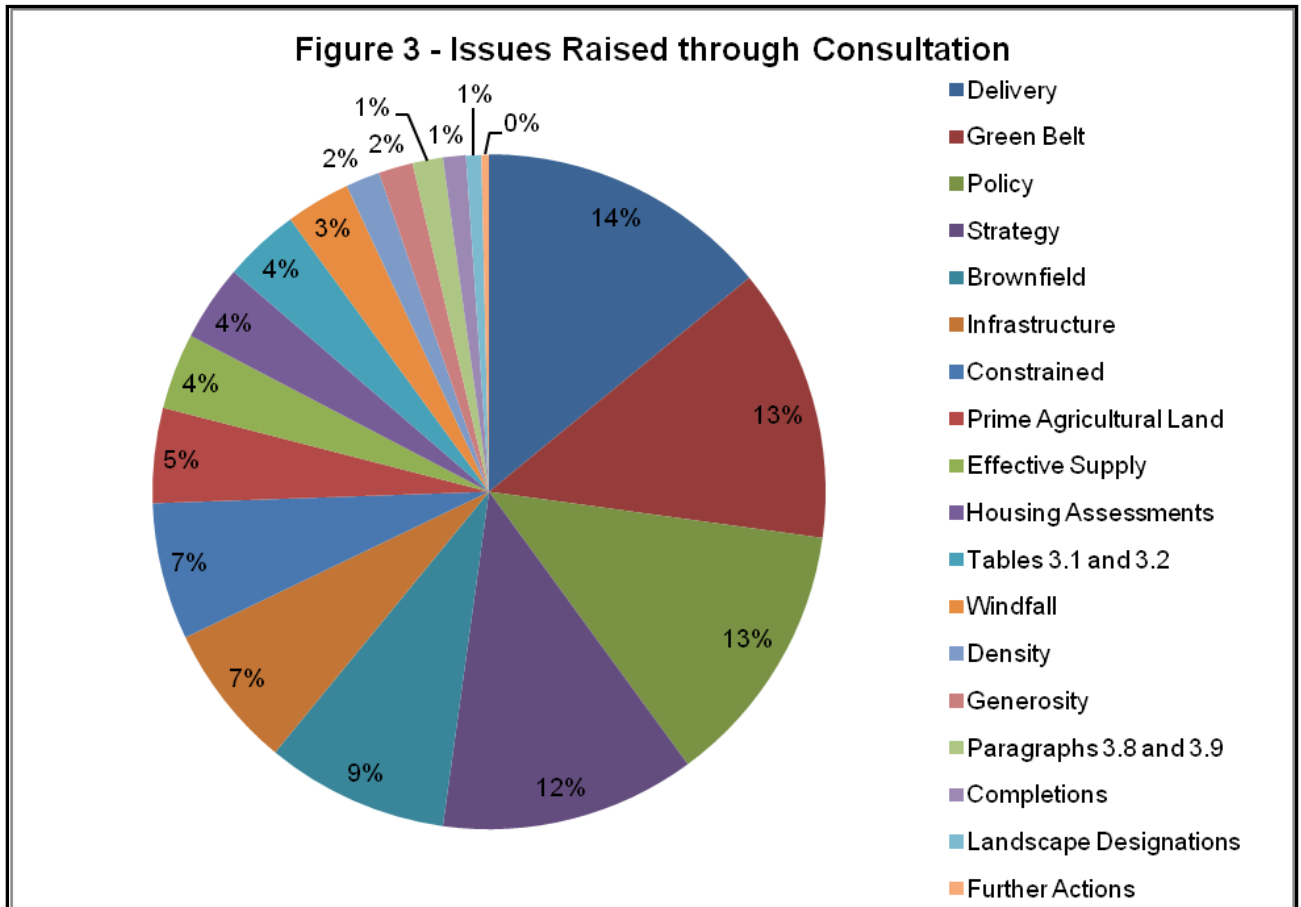


2.10 Whilst Questions 2 and 3 focussed on Tables 3.1 and 3.2 and agreement with the housing land requirement figures, Questions 5 and 6 sought responses on wider planning issues related primarily to infrastructure and delivery. These responses will inform future iterations of the SDP, other ongoing related work on infrastructure funding and delivery and the preparation of LDPs.

2.11 Question 7 sought any further comments. For those making one single comment, often individual members of the public, this is where they made their comments. Others used their responses to this question to summarise the points they had made in the previous questions.

**The Issues Raised**

2.12 As detailed within Appendix B the responses received have raised several issues. The majority of the responses as shown in Figure 3 below focus on four issues – delivery (14%), the Green Belt (13%), policy (13%) and strategy (12%).



- 2.13 **Delivery** - The majority of responses (Appendix B Issue D3) raised the issue of lack of finance and that it is the current economic downturn which is preventing delivery. Both the SDP and LDP will promote sustainable economic growth and housing completions will be required to be increased from recent levels. This is challenging and ambitious and SESplan together with the Member Authorities will continue to work with the development industry, key agencies and the Scottish Government to increase housing delivery rates.
- 2.14 **Green Belt** – The clear majority of responses (Appendix B Issue J1) advised that the Green Belt should be protected for the benefits it provides. In terms of the Supplementary Guidance the Green Belt was a criteria examined through the Spatial Strategy Assessment. The purpose and importance of the Green Belt are acknowledged in SDP Policy 12 (Green Belts). A key criteria of SDP Policy 7 (Maintaining a Five Year Housing Land Supply) is that development on greenfield sites either within or outwith the identified SDAs will not undermine Green Belt objectives.
- 2.15 **Policy** – Related to the responses on the Green Belt, a number of respondents considered that delivery of the housing land requirement on greenfield land will lead to outcomes contrary to the Government’s and SESplan’s overall Vision and Aims (Appendix B Issue Q1). In preparing the Supplementary Guidance, SESplan has taken a balanced and considered approach. The housing land requirement across the SESplan area has to be met and the Supplementary Guidance seeks to do this by balancing the requirement to meet sustainable economic growth objectives with other goals whilst taking into account infrastructure and environmental constraints.
- 2.16 **Strategy** – A number of respondents considered that there is no justification to explain the distribution of the housing land requirement set out in Table 3.1 (Appendix B Issue S1). As detailed in the Technical Note, the distribution of the requirement is based upon a full consideration of the infrastructure and environmental constraints across the SESplan area. To assist clarity, it is proposed to replace Paragraph 3.5 of the Guidance. The replacement wording will provide further transparency as to the assessments undertaken to inform the Supplementary Guidance.

## The Key Agencies and Scottish Government

- 2.17 Responses were received from four key agencies (Scottish Natural Heritage (SNH), SEPA, Scottish Water and Historic Scotland) and Scottish Government which included comments from Transport Scotland.
- 2.18 SNH, in answering Question 2, advised they cannot comment on housing need and demand. However, SNH did advise that meeting the housing land requirement is likely to impact on a number of natural heritage interests, including soils, habitats, species and landscape and that opportunities for enhancement should be identified within LDPs. There was agreement on Question 3 with further advice that the distribution of housing numbers should be used to realise strategic infrastructure, placemaking and green network opportunities.
- 2.19 SEPA advised that flood risk should be given more consideration with a Strategic Flood Risk Assessment (SFRA) being produced alongside the Supplementary Guidance. On Question 3, SEPA advised that they cannot answer this question without comprehensive assessments of all allowances, for which detailed site boundaries would be necessary. Flooding and water management is of concern. SEPA understands that water and drainage infrastructure capacity has been taken into account when assessing infrastructure constraints. This assessment, however, only considers Scottish Water infrastructure and not other issues relevant to water management. The impacts of development on ground and surface water within South East Edinburgh for example and the potential for increased flood risk from inadequate drainage or a lack of integration of drainage between individual developments is of considerable concern to SEPA. An even greater housing land allowance in this area between the Edinburgh and Midlothian Council areas only emphasises the need for strategic SUDS to enable development in and between these two LDP areas.
- 2.20 Scottish Water advised that they fully support the Supplementary Guidance and, at the present time, have no other comments to make.

- 2.21 Historic Scotland responded to Question 4 advising that they have no specific comments to make in relation to the actual breakdown and distribution of the additional allowances within or outwith the SDAs. Historic Scotland did note that the allocation of additional housing land increases the potential for impacts on the historic environment which will require to be reviewed during the site allocation process by the relevant Local Authorities in the preparation of their LDP's.
- 2.22 Scottish Government advised that they are content and agree with Tables 3.1 and 3.2 subject to the queries raised under Questions 5 and 6. In relation to Question 5, the Government noted that without a clear understanding of the phasing of development and infrastructure provision, the impact on the deliverability of development that may require additional infrastructure is unclear. The failure of the process so far to provide a resolution that is supported by all stakeholders and delivers a clear mechanism, or mechanisms, for addressing cross boundary transport issues and funding contributions, and a suite of interventions shown to be deliverable, at least in part by such mechanisms, means that the deliverability of the infrastructure that might be necessary to support the overall spatial strategy is questionable.
- 2.23 Under Question 6, Transport Scotland advised that they would be in a position to engage with authorities to identify what mitigation might be appropriate to address the impact on the strategic transport network. It would then be possible to consider phasing of this mitigation, the levels of detriment that might be appropriate and to take an informed view on how cumulative impacts might be addressed through appropriate delivery mechanisms.
- 2.24 The comments raised by the key agencies are noted, however the issues raised by SNH, SEPA and Historic Scotland are outside the remit of the Supplementary Guidance which focuses on setting a housing land requirement for the SESplan area. Work is underway on an SFRA for the SESplan area to inform the Main Issues Report (MIR) for SDP2.

2.25 In terms of transport and infrastructure again work is underway and discussions ongoing between Transport Scotland, SEStran and the member authorities to further understand the issues and how they can be dealt with. All key parties, including the Scottish Government, will have a role in funding infrastructure in the SESplan region.

### **3. Responses and Proposed Editorial Changes**

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3.1 As set out in Appendix B and Figure 3 above, the summaries of the responses were grouped into issues raised under subject headings – brownfield, completions, constrained, delivery, density, effective supply, further actions, general, generosity, green belt, housing assessments, infrastructure, key agency, landscape designations, paragraphs 3.8 and 3.9, policy, prime agricultural land, strategy, Tables 3.1 and 3.2 and windfall. Responses which raised particular LDP issues were categorised by Member Authority.

3.2 Each response, summary and issue was given full consideration as to whether the correct approach had been taken with the preparation, policy compliance and content of the Supplementary Guidance. The next step was to provide a considered officer response to the issues raised and to identify if any modifications should be made.

3.3 Whilst the responses requested many changes to be made on various issues, it is felt that the content of the Supplementary Guidance is the most appropriate outcome following the weighing up the planning considerations. Many wanted wholesale changes which would have not been in line with the strategy of the approved SDP and would have undermined the delivery of existing committed development. Many of the issues raised were also relating to specific sites and locations rather than wider strategic locations and are therefore more appropriate for the relevant LDP to address. These comments are available to the member authorities when considering their LDPs.

3.4 Nevertheless following a comprehensive review of the responses received and the draft Guidance it is proposed that some editorial changes are made to the Guidance itself and the accompanying Technical Note. The full detail of the changes is set out in Appendix C. In summary, these are:

- An expanded descriptive paragraph in the Supplementary Guidance explaining how the shortfall of meeting housing need that arises in Edinburgh will be met;
- Clarifying the role and justification behind identifying land outwith Strategic Development Areas;
- Editorial changes to Sections 5 and 6 of the Technical Note clarifying the methodology undertaken and that the Supplementary Guidance must accord with the approved Spatial Strategy; and
- Corrections to the Technical Note.

#### **4. Strategic Environmental Assessment and Habitats Regulations Appraisal**

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4.1 Scottish Borders Council prepared the SEA and HRA on behalf of SESplan. This was considered at September 2013 Joint Committee. The Environmental Report was consulted upon at the same time as the Supplementary Guidance and was made available on the SEA Gateway and the SESplan Consultation Portal.

4.2 The Environmental Report and the analysis within it was based on updating the Environmental Report for the SDP. It assessed the potential impacts of the implementation of the housing land requirements and additional allowances on the nine environmental objectives of the SEA, in comparison to the SDP SEA.

4.3 This approach was discussed and agreed with the Consultation Agencies (SNH, Historic Scotland and SEPA) in advance of producing the report.

4.4 Responses from the Consultation Authorities resulted in making changes to the SEA monitoring framework, wording changes within the Environmental Report and changes to the impact assessment on air quality and cultural heritage. Full details on the consultation responses and changes are available in the Environmental Report in Appendix D.

4.5 The key findings of the SEA were potential impacts on:

- Air Quality – increased car emissions;
- Cultural Heritage – impact of development;
- Landscape and Townscape;
- Soil; and
- Water.

4.6 These impacts could be mitigated through measures that can be introduced through LDPs. These include:

- Locating development in locations accessible to sustainable transport;
- Taking a design-led approach to development in LDPs;
- Locating development to avoid impact on landscape designations;
- Protecting conservation areas;
- Prioritising brownfield sites; and
- Using sustainable urban drainage systems (SUDS).

4.7 Due to the strategic nature of the Supplementary Guidance more detailed impacts and mitigation measures will be identified as part of SEA work undertaken for LDPs.



- 4.8 The regulations require SESplan to produce an SEA Post Adoption Statement and publicise details of the adopted Supplementary Guidance and the accompanying Environmental Report. This will be done following adoption of the Supplementary Guidance. It is proposed to publicise this in the Scotsman rather than all individual local newspapers. This will result in a cost reduction.
- 4.9 HRA is a process to assess whether the proposals within a plan will cause likely significant effects (LSE) on European Sites within and outwith the SESplan area. The methodology builds on the HRA undertaken for the SDP.
- 4.10 As with the SDP HRA, it was found that there could be LSEs on European Sites but that a further assessment would be required at LDP level. This would determine the precise nature of these and any mitigation requirements that would arise as a result of the housing requirements of the Supplementary Guidance. The HRA sets out strategic mitigation measures that could guide development in LDPs.
- 4.11 The updated SEA Environmental Report and draft HRA Record can be found in Appendices D and E. The HRA Record is required to be considered draft until the Supplementary Guidance is adopted and no further changes are made. If Minister's direct that any changes should be made, it will require to be amended to reflect those. Following the adoption of the Supplementary Guidance, the HRA Record will need to be finalised and an SEA Adoption Statement published. The publication of the SEA Adoption Statement requires to be advertised.

## **5. Next Steps**

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- 5.1 Once approved by SESplan Joint Committee, Section 22 requires the Authority to send Scottish Ministers a copy of the Guidance they wish to adopt. Authorities must also send Ministers a Statement setting out the publicity measures they have undertaken, the comments received and an explanation of how these comments were taken into account.

- 5.2 Paragraph 143 and 144 of Circular 6/2013 (Development Planning) advises that, given that the principle of Supplementary Guidance will already have been established, scrutiny by Scottish Ministers is likely to focus more on ensuring that the principles of good public involvement and a proper connection with the SDP have been achieved consistently, rather than on detailed policy content. However, Ministers will not wish to allow Supplementary Guidance to be adopted which they consider significantly contrary to SPP.
- 5.3 Subject to approval by the SESplan Joint Committee, the minor editorial changes and the decision to submit, the Supplementary Guidance on Housing Land will require to be ratified by each of the member authorities. Member Authorities as well as ratifying these decisions will be required to adopt the Guidance at the expiration of the 28 day Ministerial consideration period unless Scottish Ministers direct otherwise. This process of ratifying the SESplan Joint Committee decisions at Recommendations 3 and 4 of this Report and adopting the Guidance in line with Recommendation 5 of this Report is anticipated to be concluded by the 15 May 2014.
- 5.4 Following ratification and adoption (subject to Ministerial consideration) the Supplementary Guidance will be submitted to Scottish Ministers on the 16 May 2014. After 28 days has elapsed (13 June 2013) and unless Scottish Ministers have directed otherwise, the Guidance will be adopted by each of the Member Authorities.
- 5.5 The process of preparing and adopting the Supplementary Guidance will therefore have been completed within the timescale set out in the SDP approval letter, where Scottish Ministers set out that they expected the Guidance to be adopted within 12 months from the date of approval of the SDP i.e. by no later than the 27 June 2014.

## **Appendices**

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- A** Summaries of Consultation Responses Received on the draft Supplementary Guidance on Housing Land

- B** Summary of the main issues raised by the Consultation Responses Received and SESplan Responses to the Consultation Responses Recieved on the draft Supplementary Guidance on Housing Land
- C** Proposed Editorial Changes to the draft Supplementary Guidance on Housing Land
- D** Strategic Environmental Assessment Environmental Report
- E** Habitats Regulations Assessment

### **Report Contact**

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**Report Agreed By:** Ian Angus, SDP Manager

**Author Name:** Alice Miles / Graeme Marsden

**Author Job Title:** Lead Officer / Planner

**APPENDIX A**      Summaries of Consultation Responses Received on the draft  
Supplementary Guidance on Housing Land

The full responses are available to view and download at -

<http://sesplan-consult.objective.co.uk/portal/sg/hsgland>

Response ID	Respondee	Summary
<b>Question 1 - Do you agree that the Supplementary Guidance complies with Scottish Planning Policy? If not, why not? In what way does the Guidance need to change in order to comply with Scottish Planning Policy?</b>		
11	Regenco	Cannot identify constrained sites for development in plan period; The Waterfront is not a marketable or deliverable location for such development; Require allowance for flexibility in table 3.1; Winchburgh is a highly sustainable location.
12	Alfred Stewart Properties	Concern over delivery in Dunfermline
26	Liberton CC	Role of SDPA to confirm
43	SNH	No comment
50	Dr Tom Slater	No. Is not sustainable and supports development industry and landowners interests only.
57	Mr Scott Mackenzie	Yes
63	Gladman	Yes. Sets out distribution of housing requirement.
73	SEPA	Flood risk should be given more consideration with a Strategic Flood Risk Assessment being produced alongside the Supplementary Guidance.
78	SEPA	Blank
82	Musselburgh Conservation Society	Cannot be specific
92	Roslin & Bilston Community Council	More though needs to be given to meeting transport needs to new development in Midlothian. Current plans seem insufficient.
95	Cllr Dave Dempsey	Does not comply with public interest
103	Mr Grant McCulloch	Should wait until SPP review is complete
112	Murieston Community Council	Yes
122	Miss Carolyn Campbell	Cannot answer as review not complete
128	Mr Alan Harrison	Questions need for houses.
129	Banks Group	Welcomed compared to Proposed Plan
161	McTaggart & Mickel Homes	No. Housing demand not met where arising.
170	Scottish Government	Yes, subject to transport infrastructure concerns being met
177	Mansell Homes	No. Plan does not reflect economic/market reality by relying on sites and strategy from former plans that are no longer deliverable. Duplicate of 183.
183	TMS Planning Services	No. Plan does not reflect economic/market reality by relying on sites and strategy from former plans that are no longer deliverable.
189	Campion Homes	No. Plan does not reflect economic/market reality by relying on sites and strategy from former plans that are no longer deliverable. Duplicate of 183.
195	Muir Homes	No. Plan does not reflect economic/market reality by relying on sites and strategy from former plans that are no longer deliverable. Duplicate of 183.
208	Airthrie Estates	Does not comply with SPP as it does not link development to expected infrastructure delivery; additional housing is not directed to successful areas, such as West Lothian; West Lothian additional allowances are based on past movements trends and do not reflect opportunities to create sustainable new settlements.

Response ID	Respondee	Summary
215	Strawson Property	There is no explanation about the extent to which demand has been met. The SG does not explain openly and transparently how the distribution of Additional Allowances has been arrived at. The East Lothian additional allowance figure is arbitrary.
229	Grange and Prestonfield Community Council	Yes. SPP should allow for realistic SDPs.
232	Cockburn Association	Question the reliability of using projections. Welcome that Edinburgh constraints are recognised and that some demand can be met in
240	Mrs Linda Allison	Yes
242	Kalewater Community Council	Yes
249	Mrs Carol Smith	Requirement for 107,545 dwellings is not justified or based on robust data.
252	Haddington and District Amenity Society	Issues around capacity, design and deliverability
260	Barratt and David Wilson Homes	Guidance reflects the spatial strategy, SDP policy 5, and accords with SPP
268	Savills	Accords with SPP. Should require presumption in favour of sustainable development.
273	Dr David Mallon	What account has been taken of Fife Coastal Plan? Villages should be protected from development. Aberdour would not cope with increased traffic associated with development.
278	Dr David Mallon	duplicate of 273
281	Dr David Mallon	duplicate of 281
290	Mr Jon Grounsell	No. Process is driven by landowners and developers determining what is effective.
293	Balerno Community Council	Targets are unrealistic and will lead to development in protected Green Belt. Need to factor climate change and protecting agricultural land.
301	Trustees of the Foxhall Trust	Too much reliance on committed sites which are not effective and are not delivering completions. There should be a generous supply of new land.
307	EDI Brunstane	Scope to improve the SG references to SPP guidance on housing land and green belt
314	Straiton Parks Ltd.	Fails to consider deliverability of sites.
326	Mrs Ruth Schofield	Unrealistic targets will lead to development of unsuitable land.
339	Mrs Christine Shaw	Wait until SPP review is complete.
344	Mrs Gertrud Mallon	No. SG is contradictory to aims of SPP.
350	Mrs Maggie Pithie	Number of houses not justified. Alternative site status changed without notification or justification. Cammo NOT West Edinburgh. No regard for infrastructure or traffic issues. Massive negative impact on education provision. Plenty of brownfield sites available before this green belt site is stolen. Catastrophic impact on rare species.
351	Mrs Anna Purdie	No. SG is contradictory to aims of SPP.
363	Ogilvie Homes	Does not set out what the spatial strategy is. Does not seek to meet demand where it arises. fails to provide a reasoned and informed justification for the range of environmental and infrastructure constraints which are set out as the basis for the proposed geographical dispersal of the identified housing requirement.
369	Ashdale Land & Property	Does not set out what the spatial strategy is. Does not seek to meet demand where it arises. fails to provide a reasoned and informed justification for the range of environmental and infrastructure constraints which are set out as the basis for the proposed geographical dispersal of the identified housing requirement.
377	Mrs Elaine Hutchison	Unrealistic targets will lead to development of unsuitable land and won't align with sustainable development. SG must meet aims of Strategic Development Plan. Weight should be given to food production and protecting agricultural land.

Response ID	Respondee	Summary
383	Mrs Caitlin Hamlitt	Large housing requirement will require development in unsustainable locations. Pressure on councils to permit greenfield development. SG must meet aims of Strategic Development Plan. Weight should be given to food production and protecting agricultural land.
384	Mr Patrick Mitchell	No documentary train behind housing need
396	Mrs Angela Leask	Fails to take account of infrastructure in Coastal Fife, particularly Aberdour. Impact on already high traffic levels and amenity.
397	Mrs Angela Leask	Duplicate of 396
402	Mr Jon Watkins	Opposed to high housing requirement and development at Cammo. Green Belt should be protected. Cammo area infrastructure is over capacity. There are sufficient brownfield sites, the development of which should be subsidised.
413	Juniper Green Community Council	SPP is not clear on what a generous supply is.
425	Mr Paul Morris	Balerno is not suitable for large scale development due to infrastructure capacity issues. For Edinburgh, the area is poorly accessible and lack employment opportunities. Loss of green belt benefits including productive agricultural land. SG must meet the objectives of the SDP.
427	HPG Dalkeith	The SPG has relied on an update of the HNDA (Housing Need and Demand Audit), an analysis of the wider housing market and sub markets in terms of maintaining a 5 year land supply and an updated 'refresh' of the spatial strategy assessment. It is not considered that these matters have been sufficiently assessed nor are the outcomes adequately transparent in terms of their sustainable economic development rationale or consistency with underlying planning objectives. A lack of vision and ambition in relation to promoting economic recovery and aligning land finance and delivery across the SESplan area. It will not provide the basis for a maintenance of a 5 year supply of land at all times; The allocations proposed across the SESplan area and within South - East Edinburgh will not meet the principal aims and objectives of the SDP; The environmental constraints identified within the SDP are exaggerated and does not relate to the technical information or the policies within the SDP; Development economics within South East Edinburgh requires additional investment in order to provide essential infrastructure; Over-reliance on existing committed land which continues to fail to deliver; and Promoting Cauldcoats farm.
438	Mr James Poseley	Contradiction between brownfield priority and level of green belt development, including West Edinburgh.
440	Mr Blair Melville	Guidance now sets out a housing requirement based on a Housing Needs and Demand Assessment and shows this by Council/Local Development Plan area and by Strategic Plan time periods, all as required by SPP. It does not: seek to meet demand in the areas where it arises; set out alternatives or justify the preferred strategy; consider deliverability; ;set out a clear justification of the alleged environmental and infrastructure constraints; and set out a long-term spatial strategy. The spatial strategy and its implications are not clear.
449	IBG Stakeholders	There is too much reliance on committed sites and a broad based assumption of 83,207 dwellings being easily accommodated and built out. SPP warns against an over - reliance on committed sites when calculating the housing land requirement. This potentially compromises the SPP requirement to provide a generous housing land supply.
452	Banks Group	The SG fails to explain why only 100 of the 14,188 additional allowance required in excess of the Proposed Plan are capable of being accommodated in Midlothian.
455	Firrhill Community Council	Previous lower requirements are not being met, therefore are these achievable? Question the effective land supply process and developers/landowners role in it.
469	Miller Homes East Scotland	SG reflects a more compliant position with SPP. However, only if the distribution of new housing allocations creates opportunities for development in the right locations (marketable/accessible/sustainable) will SESplan and this SG be able to give clarity and confidence to the house building industry for committing to sites which will ensure delivery of housing units on the ground.
479	Mrs Blyth Peart	No comment

Response ID	Respondee	Summary
481	Strutt & Parker	Does not seek to meet need and demand in the areas that it arises, nor does it properly justify not meeting need and demand in the area it arises.
488	Dr Caroline Ritchie	Setting a target to build so many houses creates a tension between different aspects of that policy. Policies to promote sustainability and to protect agricultural and Green belt land are set against the reality that if the current fiscal climate persists, achieving the targets set will be highly dependent upon the involvement of the private sector. As their main concern is financial return for their shareholders rather than the best interests of the wider community, private companies engaged in housing development favour the use of greenfield sites in locations that will generate the most profit from their development. This frequently results in the building of houses which are not of the type that is most needed in locations which do not meet Scottish Government guidance on sustainability and are not the areas where housing is required. The Supplementary Guidance will put councils, in particular those who do not currently have the resources to subsidise the building of social and affordable housing, in the position where they are pressurised into consenting to planning applications in locations which are contrary to their own policies, in particular on high quality agricultural and Green belt land.
495	Persimmon Homes East Scotland	Partly by basing requirement on need and breaking down by LDP area. The strategy is not ambitious or succinct. More guidance should be given for the locations of allowances outside the SDAs. The justification of the strategy and the housing allowances is not clear. The SG should provide a generous supply, not a sufficient one. Deliverability has not been considered by locating development in areas where there is insufficient demand.
506	Stewart Milne Homes	In part by setting out a requirement by LDP area. But it does not: 1. seek to meet demand in the areas where it arises; 2. set out alternatives or justify the preferred strategy; 3. consider deliverability; 4. set out a clear justification of the alleged environmental and infrastructure constraints; and 5. set out a long-term spatial strategy. The strategy is not explicit and it does not set out the implications of not meeting demand where it arises.
513	Aberdour Community Council	No comment
517	Wallace Land Investment & Management	It provides no evidence of environmental and infrastructure constraints to justify why housing need and demand in the City cannot be met in full. The housing land requirement for each local development plan fails to take into account known market trends in redistributing households from City of Edinburgh to the neighbouring local authority areas. The Strategic Development Planning Authority (SDPA) has not sought to engage in partnership working with the house building sector to validate its conclusions. The SDPA must demonstrate that the proposed development strategy at the regional scale is sustainable and does not result in more commuting back to Edinburgh. The use of constrained land in the land supply calculations is contrary to SPP and SDP Policy 5. The use of additional allowances for 2019 to 2024 is contrary to SPP. The housing requirements should be modified to only allow a distribution of 19% of Edinburgh's need to other authorities. This is based on past market trends. Given the lack of compliance with SESplan SDP and SPP, it is requested that a Hearing is held to resolve the outstanding matters.
527	Hallam Land Management	It provides no evidence of environmental and infrastructure constraints to justify why housing need and demand in the City cannot be met in full. The housing land requirement for each local development plan fails to take into account known market trends in redistributing households from City of Edinburgh to the neighbouring local authority areas. It is not explained why Midlothian is the biggest receiver of redistribution from Edinburgh. The Strategic Development Planning Authority (SDPA) has not sought to engage in partnership working with the house building sector to validate its conclusions. The SDPA must demonstrate that the proposed development strategy at the regional scale is sustainable and does not result in more commuting back to Edinburgh. The use of constrained land in the land supply calculations is contrary to SPP and SDP Policy 5. The use of additional allowances for 2019 to 2024 is contrary to SPP. The housing requirements should be modified to only allow a distribution of 19% of Edinburgh's need to other authorities. This is based on past market trends. Given the lack of compliance with SESplan SDP and SPP, it is requested that a Hearing is held to resolve the outstanding matters.



Response ID	Respondee	Summary
529	Murray Estates	It does not meeting the requirements of SPP. Housing demand is not met where it arises. It does not meet sustainable growth objectives by requiring longer journeys between new homes a and jobs in Edinburgh. Disagree that the Edinburgh Green Belt should justify the redistribution of housing away from Edinburgh. It does not explain why Edinburgh, and specifically West Edinburgh, cannot accommodate more housing, and the sense is that the HoNDA redistribution has arisen from political expediency rather than a genuine attempt to strategically plan the City Region. Should not assume that constrained sites will contribute toward meeting need.
540	Taylor Wimpey	It does not meeting the requirements of SPP. Housing demand is not met where it arises. It does not meet sustainable growth objectives by requiring longer journeys between new homes and jobs in Edinburgh. Disagree that the Edinburgh Green Belt should justify the redistribution of housing away from Edinburgh as this will not lead to a sustainable settlement pattern. Should not assume that constrained sites will contribute toward meeting need.
547	Scottish Property Federation	The Supplementary Guidance reaffirms previous policy on housing allocations largely. Certain of the assumptions made in the Supplementary Guidance remain too optimistic in certain areas or are based upon notions of new housing completions that are unlikely to be achieved. This includes Edinburgh Waterfront.
550	Ashfield Commercial Properties LTD	Set out a summary of the examination. It is crucial that this SG is interpreted at the local level and that officers (and their Council members) do not maintain the status quo of simply relying on allocated sites/ commitments which are undeliverable in their current form.
565	Mr Morrison	Object to development of Green Belt land at Cammo and subsequent impact on traffic and transport infrastructure.
573	Mrs Christine Briffitt	No. The Supplementary Guidance directly contradicts many of the aims set out by Scottish Planning Policy by dictating the numbers they have to achieve despite incomplete or outdated reports and vague assessments
576	Mr Archibald Clark	No comment
583	Health & Safety Executive	Consultation not related to development near hazardous installations.
587	Cadzow Estate	No. Insufficient account has been taken of issues relating to the deliverability of a proportion of the existing sites and the real volume of current demand. The guidance is not fully compliant with SPP and does not provide a generous amount of housing land for building purposes. It will not provide the basis for a maintenance of a 5 year supply of land at all times. The allocations proposed across the SESplan area and within West Lothian will not meet the principal aims and objectives of the SDP. There is an over-reliance on existing committed land which has and continues to fail to deliver thereby reducing development potential. Not enough consideration has been given housing potential in West Lothian.
<b>Question 2 - Do you agree that the distribution of the housing land requirement across each of the six Member Authority areas set out in Table 3.1 is justified? Do you have any further comments on the distribution of the housing land requirement set out in Table 3.1 of the Supplementary Guidance?</b>		
13	Alfred Stewart Properties Ltd	Does not agree with Table 3.1. The Supplementary Guidance asserts there is a committed supply of 83,207. These figures are wholly inaccurate and give a misleading target. The Technical Note is wrong. Table 3.2 shows completions 2009 - 2019 incorrectly as 4,451, this figure should be 4,437. Paragraph 3.8 requires emerging LDPs to further examine land supply. It is inappropriate of the SDPA to abdicate this responsibility. If the process was undertaken in a robust manner the actual supply would be smaller and the actual housing land requirement larger as a result. The Supplementary Guidance uses unsubstantiated assertions for supply expected from constrained and windfall sites.
19	Regenco (Trading) Ltd	Paragraph 3.7 - There is an inconsistency in the manner in which the Supplementary Guidance deals with constrained land. These figures are wholly inaccurate and give a misleading target. The Technical Note is wrong. Table 3.2 shows completions 2009 - 2019 incorrectly as 4,451, this figure should be 4,437. Paragraph 3.8 requires emerging LDPs to further examine land supply. It is inappropriate of the SDPA to abdicate this responsibility. If the process was undertaken in a robust manner the actual supply would be smaller and the actual housing land requirement larger as a result. The Supplementary Guidance uses unsubstantiated assertions for supply expected from constrained and windfall sites.

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27	Liberton and District Community Council (Mr Jim Henry)	Agree with Table 3.1. The allocations made are consistent with the numbers in the Scottish Ministers' Approval Letter for the period 2009 and 2024. Liberton and District Community Council agrees that there is justification for this allocation.
32	Craigshill Community Council (Mr Alexander Heggie)	Does not agree with Table 3.1. West Lothian is a small county and we as a community council think 11,420 new houses are too much. Craigshill is full up. We should be looking to protect agricultural land.
35	Milesmark and Baldrige Community Council (Mr Alex McLaren)	Does not agree with Table 3.1. Fife is already experiencing significant development and it appears that the plan from 2019 continues that trend. Scottish Borders appears to be under distributed, especially with the new rail link. This plan would ease traffic congestion, which is already significant into Edinburgh from Fife. East Lothian also appears to have capacity to take more of the share and is closely situated to Edinburgh, where most people in the area will take up employment.
40	Scottish Natural Heritage (Ms Vivienne Gray)	Agree with Table 3.1. SNH cannot comment on housing need and demand. However, meeting the housing land requirement is likely to impact on a number of natural heritage interests, including soils, habitats, species and landscape. Strategic consideration of natural heritage issues associated with the housing land requirement may help to avoid or mitigate some natural heritage impacts. Realising the opportunities for the natural heritage to be enhanced through provision of multi-functional green infrastructure that connects people and wildlife should also be identified within LDPs.
51	Dr Tom Slater	Does not agree with Table 3.1. There are enough empty homes in the City of Edinburgh to address the housing shortage. East Lothian is a rural county that will become urbanised. Prime arable land (some of the best in Scotland) should be protected. There are enough empty homes in Fife, Midlothian, Scottish Borders and West Lothian to address the housing shortage.
58	Mr Scott Mackenzie	Agree with Table 3.1.
65	Gladman Developments (Simon Dean)	Agree with Table 3.1. The distribution identified in Table 3.1 is justified as it takes into account the identified need across the SESplan area within the plan period, and seeks to allocate it across areas where it can be delivered. However, adjustments to the overall distribution should not be made on the basis of specific-site assessments carried out by local authorities.
74	SEPA (Mr Paul Lewis)	SEPA cannot answer this question confidently until an SFRA is completed and the distribution of housing land identified in Table 3.1 tested against it.
83	Mr Pau Sales	Does not agree with Table 3.1. The text relating to East Lothian includes comments that the coastal strip will not be suitable for much of the allocation. The coastal strip has the most effective and faster public transport links. The inland areas are poorly serviced and there are no proposals published that show how this will be addressed and improved.
84	Musselburgh Conservation Society (Mr Barry Turner)	Agree with Table 3.1. The distribution is justified only subject to the following provisos. Suitable Green belt opportunities must be taken up in Edinburgh and Midlothian in association with existing and potential public transport availability. Green belt must be protected where it serves a particular purpose. There must be recognition of capacity constraints relating to existing communities and their services and to town centres. There must be avoidance of conglomerations of development. Such unacceptable concentrations could well be possible around Wallyford, Tranent, Prestonpans and Longniddry in East Lothian. Rail transport improvements must be delivered in East Lothian to include more peak hour trains, a half hourly off peak service, a new station at East Linton and cross-Edinburgh peak hour trains. There should be a greater allocation to the eastern Borders area associated with a new station at or near Reston and an appropriate level of service to it by stopping trains between Edinburgh and Berwick. More jobs must be provided. There must be grade separation at Sheriffhall junction and improvements at the Old Craighall junction.
93	Roslin and Bilston Community Council (Margaret Littlewood)	Does not agree with Table 3.1. This is too heavy a burden for Midlothian. not only because of the transport problems but because much of the land is either marshy or undermined with coal or mine workings or sand or gravel pits. In particular the large number of houses allocated to Bilston in BN1 is inappropriate. Bilston itself has virtually no infrastructure and could not readily be geographically linked with the housing in question.

Response ID	Respondee	Summary
97	Cllr Dave Dempsey	Does not agree with Table 3.1. The figure for Fife has been artificially inflated on two counts. First, the GROS estimates of population growth, are not in line with reality. Second, the figure for Fife would have been lower if Edinburgh could have found the sites needed to meet its housing needs. It would be better to leave the excess as "tbd" and allow time for a better estimation of the true situation.
104	Mr Grant McCulloch	Does not agree with Table 3.1. There is already considerable land approved for development. The rate of development currently seen in Edinburgh (at about 900 completions pa) indicates that there is no demand either from purchasers or from developers. By creating an opportunity, such as green belt sites in West Edinburgh, developers will cherry pick sites over those which have been approved. There is no evidence to suggest that 29,500 houses are needed in Edinburgh. Nothing has changed in the social or economic situation since the MIR to justify these figures. There was no reason to include the Cammo fields in the West Edinburgh. It has no access to the tram, it is in transport poverty already, and has to contend with a transport infrastructure that barely works.
113	Murieston Community Council (Mr Davidson McQuarrie)	Does not agree with Table 3.1. The distribution of housing land requirement is disproportionately high for West Lothian set against City of Edinburgh, Midlothian and East Lothian. For example, it is anomalous that East Lothian has a much lower allocation of land requirement than Midlothian despite having a larger population. The need and demand for housing is predominately created by City of Edinburgh and should be delivered there. Meeting the demand from within City of Edinburgh would reduce the pressure on the existing transport structure. The City of Edinburgh should maximise the use of brownfield sites and greenfield within the City. Priority should be given to brownfield sites within existing built up areas.
119	Mrs Sally Chalmers	Does not agree with Table 3.1. There is plenty of land already allocated for development in Edinburgh which is still not being built on. Developers should be required and incentivised, if necessary, to build on the sites they already have. The green belt should be untouched.
123	Miss Carolyn Campbell	Does not agree with Table 3.1. The main focus for development in Edinburgh appears to be in the West and South East. Why? It is stated that brownfield sites should be used first, Cammo is Green Belt and why has it been upgraded from an "alternative" site?
130	Banks Group (Mr Alistair Landells)	Does not agree with Table 3.1. Slightly loaded against Midlothian and West Lothian.
139	Mr Alan Harrison	Does not agree with Table 3.1. Combining the West Edinburgh and Fife totals, the Forth bridge and roads into the city could not take the extra vehicles. It might be necessary to introduce big tolls on the bridges to make people use park and ride. Cammo estate was not a preferred site why is it being pushed forward?
145	Dr Simon Jackson	Does not agree with Table 3.1. There are plenty of unfinished developments suggesting that locally there is not the demand for housing.
162	Mactaggart & Mickel (Homes) Ltd (Mr Ken Hopkins)	Does not agree with Table 3.1. The City of Edinburgh still has not accepted its share of housing demand, requiring surrounding Local Authorities to accept more development than is necessary, which is not a sustainable approach to delivering housing need. Edinburgh Council should plan for at least 5,000 houses across the plan period. Supporting document submitted. There is no evidence to back up the assumptions made on windfall and constrained supply. Increasing densities as a mathematical exercise is simplistic.
168	Mactaggart & Mickel (Homes) Ltd (Mr Ken Hopkins)	Does not agree with Table 3.1. The City of Edinburgh Council area should accept more housing development over the plan period. Housing demand arises in the City of Edinburgh and therefore the most sustainable approach to delivering the required housing numbers is to provide more housing in this area than in the surrounding local authority areas. At least 5,000 additional houses should be provided for in the Edinburgh Council area over the plan period rather than in surrounding areas. Supporting document submitted. There is no evidence to back up the assumptions made on windfall and constrained supply. Increasing densities as a mathematical exercise is simplistic.
171	Scottish Government (Mrs Roseanne Leven)	Agree with Table 3.1, subject to the responses to questions 5 and 6 (Responses 174 and 175).

Response ID	Respondee	Summary
178	Mansell Homes	Does not agree with Table 3.1. The title of Table 3.1 is misleading. The figures relate to the number of houses required within the set timescales not the amount of land required to be allocated in order to deliver this level of development. The land requirement should, in accordance with SPP and good practice, be a factor of say 20% or more higher than the number of house units in order to ensure the provision of a generous and effective land supply in LDPs. LDPs should be required to plan for this higher land allocation level.
184	TMS Planning Services	Does not agree with Table 3.1. The title of Table 3.1 is misleading. The figures relate to the number of houses required within the set timescales not the amount of land required to be allocated in order to deliver this level of development. The land requirement should, in accordance with SPP and good practice, be a factor of say 20% or more higher than the number of house units in order to ensure the provision of a generous and effective land supply in LDPs. LDPs should be required to plan for this higher land allocation level. The principle of the re-distribution of the land requirements between LDP areas appears sound albeit it is considered that a greater proportion of the allocation should be directed towards Fife and East Lothian LDP areas with related reductions in Midlothian and Scottish Borders.
190	Campion Homes	Does not agree with Table 3.1, the title of which is misleading. The figures relate to the number of houses required within the set timescales not the amount of land required to be allocated in order to deliver this level of development. These are 2 entirely separate figures. The land requirement should be 20% or more higher in order to provide a generous and effective land supply. It is unclear where the value of redistributing housing numbers to the Scottish Borders lies. A greater proportion should be directed towards the Fife LDP area with related reductions in Midlothian and Scottish Borders.
196	Muir Homes	Does not agree with Table 3.1. The title of Table 3.1 is misleading. The figures relate to the number of houses required within the set timescales not the amount of land required to be allocated in order to deliver this level of development. The land requirement should, in accordance with SPP and good practice, be a factor of say 20% or more higher than the number of house units in order to ensure the provision of a generous and effective land supply in LDPs. LDPs should be required to plan for this higher land allocation level. The principle of the re-distribution of the land requirements between LDP areas appears sound albeit it is considered that a greater proportion of the allocation should be directed towards Fife and East Lothian LDP areas with related reductions in Midlothian and Scottish Borders.
201	Mr Peter Scott	Does not agree with Table 3.1. The allocation of 2,700 additional houses in the West Edinburgh SDA should be removed or substantially reduced, due to the potential impacts on traffic in West Edinburgh and constraints on the capacities of primary and secondary schools. Traffic issues resulting from housing allocations in parts of West Edinburgh SDA to the west of Maybury Road are not adequately identified or assessed and the SDP 'Action Programme' does not include adequate proposals to mitigate the effects of traffic generated by new housing in this area.
204	Mr Stuart Sinclair	Does not agree with Table 3.1 and particularly the figures for Edinburgh.
209	Aithrie Estates	Does not agree with Table 3.1. The distribution has not been justified. It is not accepted that there are infrastructure constraints, schools in particular, in West Lothian sufficient to downgrade its relative importance in the SESplan area. Infrastructure is being provided in the Winchburgh area both by central government and by the private sector. The Forth Replacement Crossing, junction 1a on the M9, the imminent opening of Edinburgh Tram, the proximity and ongoing development of Edinburgh Airport, the Edinburgh to Glasgow Improvement Scheme, the opening of Airdrie / Bathgate, the expansion of Ingliston park and ride are all factors that make sense of a focus on the east of the county and on the Winchburgh area in particular for additional development. Paragraph 5.37 of the Technical Note which states that Transport Scotland may have concerns over the cumulative impact of development on the M8 and M9 corridor, particularly Newbridge, is not understood. SESplan seeks to direct development to areas which can benefit from planned public transport provision, thus further encouraging modal shift. It is now for the agency to carry out the necessary improvements.

Response ID	Respondee	Summary
216	Strawson Property	The number of units for East Lothian is too low for the 2009 - 2019 period compared with the figures for the same period for the other LDP Areas within SESplan. There is proven demand for new housing in East Lothian. It is vital for the economic health of the capital city to ensure that there is sufficient land supply available in the areas of greatest demand.
228	Grange and Prestonfield Community Council (Mr Tony Harris)	Agree with Table 3.1. All comments and responses are limited to the possible impact on Edinburgh.
230	Northumberland County Council (Mrs Helen Drummond)	Agree with Table 3.1. Authorities on both sides of the border have historically acknowledged that local housing markets straddle it, and that the town of Berwick-upon-Tweed in particular, provides housing, employment and services to its rural hinterland, which stretches into the eastern Scottish Borders. The County Council considers that this relationship should be acknowledged in SESplan, as acknowledged in the current Northumberland Local Plan Core Strategy, and that the scale of new housing development in the Eastern Borders SDA should take into account Berwick-upon-Tweed's local 'strategic' role. The current Northumberland Local Plan Core Strategy, Preferred Options for Housing, Employment and Green Belt Consultation Document proposes the identification of land for an additional 900 houses in Berwick to 2031, in line with aspirations to maintain and strengthen Berwick's role as a main town serving a wide rural hinterland. No objection is raised to either the provision of an additional 160 houses in the Eastern Borders SDA or 80 across the Scottish Borders to 2024.
233	Mr Jeff Chalmers	Does not agree with Table 3.1. Edinburgh does not need the new numbers of houses being suggested. These houses cannot be justified. There is no justification for placing Cammo within "West Edinburgh". The area does not have the road or school infrastructure to support such a proposal. Brownfield should be the first choice rather than the green belt.
234	The Cockburn Association (Ms Marion Williams)	The current proposed LDP for the City of Edinburgh already goes beyond the level of development that we consider acceptable. Remain unconvinced that the figures within Table 3.1 are justified. Welcome the priority being given to development on brownfield land, but are disappointed that only a small additional amount has been identified. The SEA's overall assessment of the impacts of additional housing indicates that various negative impacts can be expected. We are concerned that these may have been understated e.g. The detrimental effects upon landscape quality, amenity for communities and cumulative losses of greenbelt land. Increased cumulative, carbon emissions arising from additional housing supply and associated infrastructure could have a significant negative effect on achieving the Scottish Government's aspiration of zero carbon emissions in the near future. We find the generally positive conclusions arising from vehicle emissions confusing. The transport appraisal indicates considerable constraints at congested junctions along the City Bypass at Sheriffhall and Straiton, which may be difficult to resolve, particularly the latter. And yet the Guidance appears to over-ride these constraints in order to meet additional housing land proposals at Shawfair and along the A701 corridor. For the avoidance of doubt, we are concerned that the proposed housing requirement risks creating significant pressure on important landscapes, Green Belt and agricultural areas around Edinburgh. This would be against Scottish Planning Policy which places importance on protecting and enhancing the character, landscape setting and identity of settlements, providing access to open space and conserving prime agricultural land.
243	Kalewater Community Council	Agree with Table 3.1.
250	Mrs Carol Smith	Does not agree with Table 3.1. The city is already densely populated. Question the scale of projected growth, brownfield sites have not been fully used, green belt land should be sacrosanct to maintain quality of life for existing population.
253	Haddington and District Amenity Society (HADAS) (Chairperson Karen Stevenson)	Does not agree with Table 3.1. Considerable concern about the allocations in the current LDP being met on land previously mined (Blindwells). East Lothian has already developed considerable new housing in the period 2009 - 2019, where other authority areas are well behind in meeting their requirements. If the brownfield capacity not available in East Lothian then farmland in areas around all villages and towns will be under pressure with no clear assessment of the capacity of these areas.

Response ID	Respondee	Summary
261	Barratt and David Wilson Homes	Does not agree with Table 3.1. Whilst the SESplan HNDA requirement has now been met in full, this has been achieved through accommodating a significant proportion (40%) of the assessed demand for Edinburgh within adjoining local authority areas, which are all required to accommodate significant increases. It is critical that locations nearest where the demand derives, i.e. Edinburgh, are considered ahead of more peripheral locations. Housing land supply must address the areas of greatest demand otherwise allocations will not deliver the supply of housing envisaged. Whilst maximising investment in the Waverley rail line is supported, the ability for these areas to facilitate over 10,000 more houses than HNDA requires appears excessive. It is considered that there is an over reliance on redirecting Edinburgh's demand to Midlothian and the Scottish Borders. Further land within the South East and West Edinburgh SDA's requires to be considered for release along with further land within the identified North-West / South-West areas linked to key transport corridors. Supporting document submitted.
267	Savills	Does not agree with Table 3.1. Insufficient land has been identified for the most sustainable location for additional housing. More land should be identified to the West of Edinburgh and flexibility should be built in to re-instate significant housing at the Waterfront should the proposals for renewable energy port facilities not come forward.
272	Mr Andrew Carnduff	Does not agree with Table 3.1. The figures appear not to recognise the need for housing near to employment. The need for housing to accommodate workers in the SESplan area is not currently nor in the immediate future, in Fife, it is in Edinburgh and the Lothian's. The distribution of proposed housing is therefore inappropriate. Agricultural land should be protected.
274	Mr Martin Bailey	Does not agree with Table 3.1. Within Edinburgh it is unclear why the Waterfront cannot take more dwellings. The City should accommodate more. Fife has an unfairly generous allocation of new houses. This will encourage commuting by road and rail. West Lothian is an area where industrial redevelopment is comparatively easy to achieve, it will require a greater number of new dwellings than the 23,848 allocated. It also has a fair amount of brownfield land ripe for housing. At one level, the calculations don't appear at another the figures are over-accurate, it is absurd to claim that Midlothian will require so precise a figure (2,371).
279	Dr David Malton	Does not agree with Table 3.1. A disproportionately large number has been allocated to Fife. Aberdour is a non strategic site yet it has been targeted for 60 houses. Aberdour already has traffic problems which deter visitors.
286	Mr Thomson	Does not agree with Table 3.1. The Edinburgh numbers are too high. There is a need to create additional employment in the area of the Borders Railway. More houses in Edinburgh will only aggravate the problems in this area.
295	Balerno Community Council (Mr Richard Henderson)	Does not agree with Table 3.1. The allocation of land must proceed on the basis of a proper analysis of sustainability. The City of Edinburgh's allocation is too high and should not extend beyond the current brownfield land supply. Should be protecting prime agricultural land, the greenbelt and landscape designations. This will ensure that current transport congestion is not aggravated, and the best future use of new transport provision.
302	Trustees of the Foxhall Trust (Mr Peter Carus)	Does not agree with Table 3.1. The proportion of homes identified in the City of Edinburgh LDP area is too low. Further land for housing should therefore be identified in the City of Edinburgh Area to meet the housing needs generated from within the City of Edinburgh. West Edinburgh, in general, could accommodate further new homes.
308	EDI Brunstane Final	Does not agree with Table 3.1. The housing market in the SESplan area is pressured. Question the figure for total supply and the resultant figure for additional units. There is insufficient explanation as to how the housing land supply has been calculated and how this is based on HLA 2012 data. Assumptions behind the contribution of windfall and constrained sites are not explained. The contribution of the 18,000 units at Leith Docks needs to be clarified. The large contribution from constrained sites within the City of Edinburgh raises ongoing concerns about delivery. The Guidance is drafted on the basis that a very significant increase in housing completion rates suddenly occurs, almost immediately. This is questioned. The Guidance needs to responsibly address the provision of strategic infrastructure.

Response ID	Respondee	Summary
315	Straiton Parks Ltd (Mr Rob Snowling)	In general terms agree with the approach. However, there is additional housing land capacity within the A701 SDA that should be allocated. There is scope to increase the housing land requirement for Midlothian in order to fulfil this objective. A buffer should be added to the land requirements identified in Table 3.1 to ensure that housing land requirements are met in the event that identified sites fail to come forward during the Plan period. There is a strong interrelationship between Edinburgh and Midlothian. Consideration should be given to increasing the housing land requirement for Midlothian instead of seeking to absorb this demand within Scottish Borders and Fife, where there is very little interrelationship with Edinburgh.
327	Miss Ruth Schofield	The principles applied when establishing SESplan should continue to be adhered to. Green belt land should be protected for future generations. Prime agricultural land should not be reallocated on a whim. Transport considerations need to be taken account. Impact on local community and ecology must be taken into account.
338	Mrs Carolyn Craig	Does not agree with Table 3.1. There seems to be a disproportionate amount allocated to Fife compared to other areas, particularly considering the need is for / in Edinburgh. The Borders could take more to support the introduction of a rail service to the Borders? Midlothian is useful as it has easy access to the Edinburgh City By-pass and there is a very small amount allocated to East Lothian although there is a rail link. A new town would have new infrastructure, facilities and amenities rather than overstretching the infrastructure of small villages along the coastline and other areas.
342	Mrs Christine Shaw	Does not agree with Table 3.1. There are still large numbers of brown field sites which are not being build on. Should more desirable areas become available e.g. green belt land, then developers will choose these sites over brownfield opportunities.
345	Mrs Gertrud Mallon	Does not agree with Table 3.1. The numbers allocated to Fife are disproportionately high. The infrastructure is not in place to cope with additional housing development, especially outwith SDAs.
352	Mrs Anna Purdie	Does not agree with Table 3.1. The number of housing allocations in Fife are disproportionate. There have been large amounts of housing development in the past years and the area does not have the necessary supporting infrastructure. Coastal towns need to be preserved.
360	Mr Kenneth Murray	Does not agree with Table 3.1. No satisfactory explanation as to why the allocation for Fife should be so high.
364	Ogilvie Homes	Does not agree with Table 3.1 since it cannot be reasonably justified. It has been clear from the outset that the plan has been prepared on the basis that the City of Edinburgh was unwilling to meet its own housing land requirement. The consequence being that a certain proportion of the identified requirement would require to be met within adjoining authority areas. Whilst further details have now been provided, this information still lacks the level of detail and substance which is reasonably required. In particular, no reasonable justification has been provided as to why such a significant proportion of the City of Edinburgh requirement has been exported. The Guidance is attempting to force house buyers to move to particular locations by preventing new housing being built in <u>those areas where they actually want to live.</u>
370	Ashdale Land and Property	Does not agree with Table 3.1 since it cannot be reasonably justified. It has been clear from the outset that the plan has been prepared on the basis that the City of Edinburgh was unwilling to meet its own housing land requirement. The consequence being that a certain proportion of the identified requirement would require to be met within adjoining authority areas. Whilst further details have now been provided, this information still lacks the level of detail and substance which is reasonably required. In particular, no reasonable justification has been provided as to why such a significant proportion of the City of Edinburgh requirement has been exported. The Guidance is attempting to force house buyers to move to particular locations by preventing new housing being built in <u>those areas where they actually want to live.</u>
375	Mrs Alison Stewart	Current proposals are for Fife to provide 43% of housing development outwith SDAs. This is extremely high and query whether such a high allocation is both justified and proportionate.
378	Mrs Elaine Hutchinson	Prime agricultural land, at a time when food security is becoming of increasing concern, should be protected. Greenbelt and landscape designations should also be protected.

Response ID	Respondee	Summary
386	Mr Patrick Mitchell	Does not agree with Table 3.1. The Guidance relies on the completion of the tram line to Leith for sufficient infrastructure linking down to Granton. This will significantly limit future development in Granton although this has the bulk of Edinburgh's allocated housing development. The numbers require housing completions to rapidly rise, this is unlikely to happen, but by this time large swathes of greenbelt land will be lost. The Guidance needs to focus development on the new Waverley line to Galashiels. This line is forecast to be significantly underused. Development in West Lothian needs to be considered in terms of existing road infrastructure capacity. The approach to Edinburgh from the west is at capacity and will not be able to take significant additional commuter traffic. The Guidance and the latest LDP for Edinburgh does not fully consider existing capacity issues at key junctions leading into Edinburgh.
393	Mrs Caitlin Hamlett	Does not agree with Table 3.1. Ensuring the additional housing land requirement for the City of Edinburgh will force the release of prime greenfield sites in unsustainable locations. The erosion of prime agricultural land, green belt and open space outwith the designated SDAs is of particular concern. Insufficient weight is given to the constraints of prime agricultural land, green belt, open space and landscape.
403	Mr John Watkins	Does not agree with Table 3.1. There is no need for the additional housing. It is grossly unfair on Edinburgh to take the highest number of houses. There are huge tracts of countryside that are not green belt outwith the city which could be developed if really necessary.
408	Burnside	Does not agree with Table 3.1. The Technical Note (Chapter 3) identifies Edinburgh, Fife, Scottish Borders and East Lothian as the areas of most need. Midlothian has been allocated too much. Edinburgh city has the highest need perhaps more high density housing could be built there.
414	Juniper Green Community Council (Mr Neil Ingram)	Does not agree with Table 3.1. The proposed distribution delivers the revised housing figures, but will put all authorities under pressure to find significant amounts of undeveloped land, including some green belt land, to meet the figures.
426	Mrs Susan Warwick	Does not agree with Table 3.1. The release of green belt to accommodate housing should be very carefully examined. The land at Cammo is prime arable land and should be preserved for the generations to come.
429	HPG Dalkeith Ltd	Does not agree with Table 3.1 since there is no evidence provided to justify the land distribution contained therein. The figures appear to be based on established and not effective land with no explanation of how that land will come forward. Further detail submitted in relation to a site at Cauldcoats Farm. Many sites identified within Midlothian are not effective. The actual figure for need and demand within Midlothian is an underestimate.
439	Mr James Poseley	Does not agree with Table 3.1. There is no justification or analysis of the housing need. The numbers have no links to future employment prospects or trends. There are serious environmental and infrastructure constraints in developing the Cammo area of West Edinburgh.
450	IBG Stakeholders (Mr. Peter Carus)	Does not agree with Table 3.1. Given that Edinburgh generates by far the most demand / need for new housing within the SESplan housing market, it is considered that the proportion of homes identified in the City of Edinburgh LDP is too low, being only 27% of the total housing land requirement 2009 - 2024. Further land for housing should therefore be identified in the City of Edinburgh Council area to meet the housing needs generated from within the City of Edinburgh. West Edinburgh in particular could accommodate further new homes.
454	The Royal Bank of Scotland (RBS)	Does not agree with Table 3.1. Given that Edinburgh generates by far the most demand / need for new housing within the SESplan housing market, it is considered that the proportion of homes identified in the City of Edinburgh LDP is too low, being only 27% of the total housing land requirement 2009 - 2024. Further land for housing should therefore be identified in the City of Edinburgh Council area to meet the housing needs generated from within the City of Edinburgh. West Edinburgh in particular could accommodate further new homes.
457	Firrhill Community Council (Mr James Napier)	Does not agree with Table 3.1. Do not consider that the housing land requirement identified in Table 3.1 is justified. New development proposals will undermine the delivery of housing on existing brownfield sites.



Response ID	Respondee	Summary
463	Banks Group (Mr Alistair Landells)	Does not agree with Table 3.1. Appears that the major release suggested for North West Edinburgh and South West Edinburgh will be most certainly required. Not clear how East Lothian will be able to meet this level of extra requirement. Fife numbers can be dealt with in theory but not based on any likelihood of deliverability. Simply no arithmetical justification is put forward to justify why Midlothian are only taking an extra 100 units. Allocations are already substantial in Scottish Borders and whilst the additional figure is very small (240) there is an argument that there is already sufficient allocations made. No arithmetical equation to justify West Lothian only taking an additional 370 units. The numbers are very confusing and deceiving.
466	Mrs Blythe Peart	Does not agree with Table 3.1. The requirement for extra land for housing in the other LDP areas is to meet the needs of the City of Edinburgh. Research from Bank of Scotland indicates that there are around 10,000 empty homes in Edinburgh. These should be brought back into use before releasing greenfield land.
468	Miller Homes East Scotland Ltd	Agrees with Table 3.1. The key issue will be for Fife to ensure that the additional allocations are identified in the right place. The Reporter in the Mid Fife Local Plan Examination considered the site at Gallows Knowe, Crossgates as meeting the tests of effectiveness in full.
482	Strutt and Parker (Mr John Wright)	Agree in part with Table 3.1. Further detail should be provided on the barriers and constraints to development in the Edinburgh City Area. This is the Capital of Scotland, and will need to grow to maintain its attractiveness to investment. Steps should be taken to remove barriers to development to prevent stagnation. Displacing development outwith the City serves to prevent delivery of affordable housing and results in house price increases and unsustainable patterns of in-commuting. Are supportive of the identification of SAA 9.
489	Dr Caroline Richie	Does not agree with Table 3.1. Concerned that areas designated for housing in the draft City of Edinburgh Local Plan involve good quality agricultural land. How will food security be maintained? Acknowledge that there may be a need to build upon the Green belt but concerned at the extent to which this is taking place.
496	Persimmon Homes East Scotland (Mr Gordon Johnson)	Does not agree with Table 3.1. There is no justification or explanation for the level of identified housing need and demand for Edinburgh which is being delivered outwith the City. Edinburgh should deliver more of its own housing need and demand.
507	Stewart Milne Homes C/o Holder Planning	Does not agree with Table 3.1. Approach to housing land distribution would start by asking whether the pattern of demand evidenced in a HNDA could be met. Assertions have been made that it may / will not be possible to meet demand arising in Edinburgh in or close to the city. The evidence for these assertions is clearly lacking. The Guidance proposes to deflect 35% of Edinburgh's demand elsewhere in the period 2009 - 2019, and 51% in 2019 - 2024. The re-assessment of capacities and constraints is weak. Little detail is available on the additional sites considered and little justification offered as to why West Edinburgh and East Lothian could not accommodate more. The assessment of SAAs 9, 10, 11, 21, 22, 23 is superficial.
514	Aberdour Community Council	Does not agree with Table 3.1. Fife has been allocated a disproportionate number of houses.
519	Wallace Land Investment & Management	Does not agree with Table 3.1. The figures are not fully explained or justified, with no supporting evidence provided. The methodology appears to identify the Additional Allowances first and then confirm a housing land requirement for each LDP area. This is contrary to SDP Policy 5 and SPP. The identification of Additional Allowances is not required. Redistributing 35% of Edinburgh's need and demand out of the City in the period 2009 - 2019 and 50% in the period 2019 - 2024 is unsustainable as it encourages commuting back into the City. The development strategy for the redistribution is random and not supported by economic growth or transport improvements. The strategy should follow the HMAA evidence redistributing 19% of Edinburgh's need and demand to East Lothian first followed by West Lothian, Midlothian and then Fife. The contribution from constrained sites is overstated. Supporting document including proposed modifications submitted.

Response ID	Respondee	Summary
528	Hallam Land Management	Does not agree with Table 3.1. The figures are not fully explained or justified, with no supporting evidence provided. The methodology appears to identify the Additional Allowances first and then confirm a housing land requirement for each LDP area. This is contrary to SDP Policy 5 and SPP. The identification of Additional Allowances is not required. Redistributing 35% of Edinburgh's need and demand out of the City in the period 2009 - 2019 and 50% in the period 2019 - 2024 is unsustainable as it encourages commuting back into the City. The development strategy for the redistribution is random and not supported by economic growth or transport improvements. The strategy should follow the HMAA evidence redistributing 19% of Edinburgh's need and demand to East Lothian first followed by West Lothian, Midlothian and then Fife. The contribution from constrained sites is overstated. Supporting document <u>including proposed modifications submitted.</u>
530	Murray Estates C/o Holder Planning	Does not agree with Table 3.1. The figures are not justified. The proposed distribution does not adequately reflect the patterns of demand and housing market analysis within the HNDA. The Guidance proposes to redistribute significant levels of Edinburgh's housing demand during the periods 2009 - 2019 and 2019 - 2024 primarily to Midlothian and Scottish Borders, and to a lesser extent Fife and East Lothian. This is not fully reflective of the housing market analysis undertaken. It is flawed to rely on the Scottish Borders to such an extent. The strategy will be undeliverable in terms of market demand.
541	Taylor Wimpey C/o Holder Planning	Does not agree with Table 3.1. The figures are not justified and does not reflect the patterns of demand and housing market analysis as presented by the HNDA. Selective account and application of infrastructure / environmental constraints appears to have been taken in reaching these conclusions. Redistributing significant levels of Edinburgh's housing demand is not fully reflective of the housing market analysis undertaken. The reliance on Scottish Borders is flawed. There is a risk the strategy will be undeliverable.
548	Scottish Property Federation (Mr David Melhuish)	Does not agree with Table 3.1. Further planned expansion of housing allocations is feasible and desirable in the City of Edinburgh area. Question whether Fife will be able to deliver the housing identified. In West Lothian there is significant investment in the Winchburgh area but this will need to be supported by progress with infrastructure improvements.
551	Ashfield Commercial Properties Ltd	The greatest challenge lies at the local level where sites for these additional allowances must be found. Concur with the view that those authorities best placed, strategically to deliver additional housing, take a proportion of the City's need and demand in addition to meeting their own housing need and demand, such as East Lothian. As no significant brownfield sites have been identified, greenfield sites have to be included.
558	Mr Nick Lansdell	Does not agree with Table 3.1. The proportion of housing required from West Lothian is not supported by the availability of infrastructure. Creating housing in support of the City creates an unsustainable environment impact and an impact on quality of life for West Lothian residents who are increasingly living not in a semi-rural environment but a series of sprawling conurbations. The numbers for West Lothian should be reduced.
566	Morrison	Does not agree with Table 3.1. There is no satisfactory explanation or justification for the increase in the numbers. Justification of the specific areas to be included particularly the proposed use of existing Green Belt land should be provided.
577	Mr Archibald Clark	Does not agree with Table 3.1. The HNDA figures are based on GROS which are themselves based on estimates, trends and migration and take no account of the change in the economic situation that has developed since. It is unwise to be identifying land beyond a 10-year period since such figures become progressively more unrealistic. The major conurbations in the central belt are spreading out into good quality agricultural land. Densities should be increased. The assumption that 'family-size' houses are needed is not borne out by the statistics. Should be looking at existing infrastructure (roads, sewers, gas, electricity, school and shopping provision) to support new / replacement housing rather than extending the roads to new sprawling low-density estates.
588	Cadzow Estate	Does not agree with Table 3.2. Do not agree that West Lothian is in any way self-contained. Concerned that the provision of sufficient housing to supply the 'cross Plan' requirement created by the Gyle / Airport / Newbridge / Livingston employment corridor has not been adequately addressed. Despite this corridor being a primary economic driver for the region the requirement assessed for West Lothian appears to be very conservative and out of kilter with some of the other plan areas.

Response ID	Respondee	Summary
<b>Question 3 - Do you agree with the breakdown by Strategic Development Area as shown in Table 3.2 of the Supplementary Guidance? Do you have any further comments on the additional allowances by Strategic Development Area set out in Table 3.2 of the Supplementary Guidance?</b>		
9	Ms N Clarke	Does not agree with Table 3.1. The rapid urbanisation of East Lothian has had a detrimental effect on public transport systems, schools and healthcare. Continually building on greenfield sites severely damages the environment, biodiversity, food security and quality of life. A railway is being built in the Borders yet they have only been allocated a limited number of houses.
14	Alfred Stewart Properties Ltd	Paragraph 3.7 - There is an inconsistency in the manner in which the Supplementary Guidance deals with constrained land. These figures are wholly inaccurate and give a misleading target. The Technical Note is wrong. Table 3.2 shows completions 2009 - 2019 incorrectly as 4,451, this figure should be 4,437. Paragraph 3.8 requires emerging LDPs to further examine land supply. It is inappropriate of the SDPA to abdicate this responsibility. If the process was undertaken in a robust manner the actual supply would be smaller and the actual housing land requirement larger as a result. The Supplementary Guidance uses unsubstantiated assertions for supply expected from constrained and windfall sites.
20	Regenco (Trading) Ltd	Paragraph 3.7 - There is an inconsistency in the manner in which the Supplementary Guidance deals with constrained land. These figures are wholly inaccurate and give a misleading target. The Technical Note is wrong. Table 3.2 shows completions 2009 - 2019 incorrectly as 4,451, this figure should be 4,437. Paragraph 3.8 requires emerging LDPs to further examine land supply. It is inappropriate of the SDPA to abdicate this responsibility. If the process was undertaken in a robust manner the actual supply would be smaller and the actual housing land requirement larger as a result. The Supplementary Guidance uses unsubstantiated assertions for supply expected from constrained and windfall sites.
28	Liberton and District Community Council (Mr Jim Henry)	Agree with Table 3.2. The Scottish Ministers' Approval Letter gives priority to the development of brownfield land and to land in the thirteen SDAs. The increase in the South East Edinburgh SDA on the face of it appears excessive. However, the increases in some of the other SDAs are much greater. However paragraph 3.10 indicates that it is the role of LDPs to identify how much housing land should be allocated to the SDAs placing in question the value of Table 3.2. This means that should City of Edinburgh deem it acceptable the South East Edinburgh SDA could be expected to take more than 2,500. The intentions of City of Edinburgh will not be known until June 2014 at the earliest. The approach in paragraph 3.10 is wrong. SESplan should play its strategic planning role and be the vehicle for setting the housing land targets within its area. Liberton and District Community Council is prepared to accept the allocation of 2,500 houses in the South East Edinburgh SDA for the period 2009 - 2024 as a maximum number. No additional houses should be allocated to this SDA over the period to 2032.
33	Craigshill Community Council (Mr Alexander Heggie)	Does not agree with Table 3.2. West Lothian is too small a county for a large number of new houses. Most of West Lothian is good agricultural land and the increase of new houses is going to take up too much land. An increase in population is going to need more food.
36	Milesmark and Baldrige Community Council (Mr Alex McLaren)	Does not agree with Table 3.2. North Dunfermline already has an agreed plan for significant development. It would appear that there are other areas closer to the M90 that haven't been considered within Fife e.g. Kelty, Kinross and Southern Dunfermline. The allocation seems to be overtly biased to one area of Dunfermline.
39	Craigshill Community Council (Mr Alexander Heggie)	Does not agree with Table 3.2. There is not enough brown land sites to build all those houses. Good farm land is needed to grow food for the rising population, that is disappearing fast. West Lothian has good agricultural land for crop growing this should be protected.
44	Scottish Natural Heritage (Ms Vivienne Gray)	Agree with Table 3.2. The distribution of housing numbers in the SDAs should be used to realise strategic infrastructure, placemaking and green network opportunities. Collaboration will be required. The Guidance presents an opportunity to set a strategic direction for maintaining green belt character and function in and around areas proposed for development. SNH recommend that the Guidance should set out written or spatial requirements for strategic green infrastructure provision within the green belt.

Response ID	Respondee	Summary
52	Dr Tom Slater	Does not agree with Table 3.2.
59	Mr Scott Mackenzie	Agree with Table 3.2.
66	Gladman Developments (Simon Dean)	Agree with Table 3.2. It is important that SESplan sets out how the full, assessed need will be provided for across the SDP area. This will give the relevant authorities the information they need to produce LDPs to begin to address the housing needs in their areas. The breakdown by SDA will also assist in identifying where additional sites are required in order to meet those needs.
75	SEPA (Mr Paul Lewis)	SEPA cannot answer this question without comprehensive assessments of all allowances, for which detailed site boundaries would be necessary. Flooding and water management is of concern. SEPA understands that water and drainage infrastructure capacity has been taken into account when assessing infrastructure constraints. This assessment however, only considers Scottish Water infrastructure and not other issues relevant to water management. The impacts of development on ground and surface water within South East Edinburgh for example and the potential for increased flood risk from inadequate drainage or a lack of integration of drainage between individual developments is of considerable concern to SEPA. An even greater housing land allowance in this area between the Edinburgh and Midlothian Council areas only emphasises the need for strategic SUDS to enable development in and between these two LDP areas.
85	Musselburgh Conservation Society (Mr Barry Turner)	Does not agree with Table 3.2. Numbers should be increased to reflect potential public transport improvements. The numbers in East Lothian can only be justified subject to the following provisos. Suitable Green belt opportunities must be taken up in Edinburgh and Midlothian in association with existing and potential public transport availability. Green belt must be protected where it serves a particular purpose. There must be recognition of capacity constraints relating to existing communities and their services and to town centres. There must be avoidance of conglomerations of development. Such unacceptable concentrations could well be possible around Wallyford, Tranent, Prestonpans and Longniddry in East Lothian. Rail transport improvements must be delivered in East Lothian to include more peak hour trains, a half hourly off peak service, a new station at East Linton and cross-Edinburgh peak hour trains. There should be a greater allocation to the eastern Borders area associated with a new station at or near Reston and an appropriate level of service to it by stopping trains between Edinburgh and Berwick. More jobs must be provided. There must be grade separation at Sheriffhall junction and improvements at the Old Craighall junction. There is an intact disused railway line that serves the northern end of the A701 corridor. This could become part of an extended tram network at minimum cost if trams are to run to the Royal Infirmary and thus could open up areas to development.
98	Cllr Dave Dempsey	Does not agree with Table 3.2. Comments relate to North Dunfermline and Ore / Upper Leven Valley SDA. It's for Fife to determine the breakdown in a manner that's open to public scrutiny. The document is too obscure and opaque to allow the lay public to take a sensible view.
105	Mr Grant McCulloch	Does not agree with Table 3.2. The current green belt is robust and it is clearly defined by the Maybury Road, and city by-pass. The IBG proposal is accepted, but the rest of the green belt around West Edinburgh should be left as it is. There has been no good explanation as to why the substantial increases from the MIR and Proposed Plan are now sought. Encroachment onto the green belt should not be allowed without justification.
114	Murieston Community Council (Mr Davidson McQuarrie)	Agrees with Table 3.2.
124	Miss Carolyn Campbell	Does not agree with Table 3.2. The Cammo site is on Green Belt land and if it is lost to housing it will be the start of a gradual erosion off the green belt in the west of Edinburgh. The Maybury / Barnton road cannot cope with the present volume of traffic. There will also be more traffic coming into west Edinburgh when the new Forth crossing is completed.
131	Banks Group (Mr Alistair Landells)	Agrees with Table 3.2.
132	Banks Group (Mr Alistair Landells)	As Response 131.

Response ID	Respondee	Summary
140	Mr Alan Harrison	Does not agree with Table 3.2. The roads are full to capacity hence traffic control on A90 into and out of city at rush hour, there are no schools, doctors, dentists available. The tolls on the bridge should be £5 to reduce traffic and encourage park and ride for the extra houses in Fife.
146	Dr Simon Jackson	Does not agree with Table 3.2. There are plenty of unfinished developments suggesting that locally there is not the demand for housing. Cammo is not West Edinburgh. Roads / schooling / GPs etc are not in the area locally to support all the extra housing.
163	Mactaggart & Mickel (Homes) Ltd (Mr Ken Hopkins)	Does not agree with Table 3.2. 5,000 new houses should be provided for across the Edinburgh area. Supporting document submitted. There is no evidence to back up the assumptions made on windfall and constrained supply. Increasing densities as a mathematical exercise is simplistic.
172	Scottish Government (Mrs Roseanne Leven)	Agree with Table 3.2. Content, subject to your responses to questions 5 and 6 (Responses 174 and 175)
179	Mansell Homes	Does not agree with Table 3.2. The approach set out within paragraph 3.4 appears reasonable and generally in line with SPP and the Scottish Government's determination related to the Proposed Plan. However, where brownfield land is not available / sufficient / deliverable and where there is no reasonable prospect of delivering additional development of the scale required within the necessary timeframe in some / many of the existing SDAs, then it is utter folly to seek to base land use planning strategy/policy on such an approach. There is a need to look more constructively at the delivery of sites in the short / medium term in order to support / supplement delivery from those SDAs that can contribute to meeting housing need within the identified timescale. A number of SDA locations remained significantly constrained and adding more allocations is not an appropriate response. Additional allocations in both Fife and East Lothian are considered appropriate and this has been reflected to some extent within Table 3.2. It remains unclear how these figures were reached and how the breakdown between development within and outwith SDAs has been calculated, particularly in Fife. A higher level of allocation in East Lothian and Fife is fully justified. Albeit the SDA/non-SDA breakdown in Fife is inappropriate and not supporting of delivery objectives. While there remains merit in allocations in and around Dunfermline the same cannot be concluded in respect of the Ore / Upper Leven Valley. There is already land for many thousands of units allocated in this area with little development progress. A significant proportion, if not all, of the additional 3,220 units proposed within the Ore / Upper Leven Valley allocation should be for sites outwith the SDAs. There are many smaller settlements in accessible parts of Fife with capacity.
185	TMS Planning Services	The approach set out within paragraph 3.4 appears reasonable and generally in line with SPP and the Scottish Government's determination related to the Proposed Plan. However, where brownfield land is not available / sufficient / deliverable and where there is no reasonable prospect of delivering additional development of the scale required within the necessary timeframe in some / many of the existing SDAs, then it is utter folly to seek to base land use planning strategy/policy on such an approach. There is a need to look more constructively at the delivery of sites in the short / medium term in order to support / supplement delivery from those SDAs that can contribute to meeting housing need within the identified timescale. A number of SDA locations remained significantly constrained and adding more allocations is not an appropriate response. Additional allocations in both Fife and East Lothian are considered appropriate and this has been reflected to some extent within Table 3.2. It remains unclear how these figures were reached and how the breakdown between development within and outwith SDAs has been calculated, particularly in Fife. A higher level of allocation in East Lothian and Fife is fully justified. Albeit the SDA/non-SDA breakdown in Fife is inappropriate and not supporting of delivery objectives. While there remains merit in allocations in and around Dunfermline the same cannot be concluded in respect of the Ore / Upper Leven Valley. There is already land for many thousands of units allocated in this area with little development progress. A significant proportion, if not all, of the additional 3,220 units proposed within the Ore / Upper Leven Valley allocation should be for sites outwith the SDAs. There are many smaller settlements in accessible parts of Fife with capacity.

Response ID	Respondee	Summary
191	Campion Homes	<p>Does not agree with Table 3.2. The approach set out within paragraph 3.4 appears reasonable and generally in line with SPP and the Scottish Government's determination related to the Proposed Plan. However, where brownfield land is not available / sufficient / deliverable and where there is no reasonable prospect of delivering additional development of the scale required within the necessary timeframe in some / many of the existing SDAs, then it is utter folly to seek to base land use planning strategy/policy on such an approach. There is a need to look more constructively at the delivery of sites in the short / medium term in order to support / supplement delivery from those SDAs that can contribute to meeting housing need within the identified timescale. A number of SDA locations remained significantly constrained and adding more allocations is not an appropriate response. Additional allocations in both Fife and East Lothian are considered appropriate and this has been reflected to some extent within Table 3.2. It remains unclear how these figures were reached and how the breakdown between development within and outwith SDAs has been calculated, particularly in Fife. A higher level of allocation in East Lothian and Fife is fully justified. Albeit the SDA/non-SDA breakdown in Fife is inappropriate and not supporting of delivery objectives. While there remains merit in allocations in and around Dunfermline the same cannot be concluded in respect of the Ore / Upper Leven Valley. There is already land for many thousands of units allocated in this area with little development progress. A significant proportion, if not all, of the additional 3,220 units proposed within the Ore / Upper Leven Valley allocation should be for sites outwith the SDAs. There are many smaller settlements in accessible parts of Fife with capacity.</p>
197	Muir Homes	<p>Does not agree with Table 3.2. The approach set out within paragraph 3.4 appears reasonable and generally in line with SPP and the Scottish Government's determination related to the Proposed Plan. However, where brownfield land is not available / sufficient / deliverable and where there is no reasonable prospect of delivering additional development of the scale required within the necessary timeframe in some / many of the existing SDAs, then it is utter folly to seek to base land use planning strategy/policy on such an approach. There is a need to look more constructively at the delivery of sites in the short / medium term in order to support / supplement delivery from those SDAs that can contribute to meeting housing need within the identified timescale. A number of SDA locations remained significantly constrained and adding more allocations is not an appropriate response. Additional allocations in both Fife and East Lothian are considered appropriate and this has been reflected to some extent within Table 3.2. It remains unclear how these figures were reached and how the breakdown between development within and outwith SDAs has been calculated, particularly in Fife. A higher level of allocation in East Lothian and Fife is fully justified. Albeit the SDA/non-SDA breakdown in Fife is inappropriate and not supporting of delivery objectives. While there remains merit in allocations in and around Dunfermline the same cannot be concluded in respect of the Ore / Upper Leven Valley. There is already land for many thousands of units allocated in this area with little development progress. A significant proportion, if not all, of the additional 3,220 units proposed within the Ore / Upper Leven Valley allocation should be for sites outwith the SDAs. There are many smaller settlements in accessible parts of Fife with capacity.</p>
210	Aithrie Estates	<p>Does not agree with Table 3.2. The breakdown by SDAs and in particular the use of one SDA across West Lothian is flawed. It is the role of the SDP to give guidance to the LDP. Leaving the decision solely to the LDP as to the locations which will best achieve house completions is an abrogation of responsibility. Flexibility is hardly relevant in dealing with what can only be described as a crisis from delaying the process for many years. This delay has contributed to the massive backlog in the supply of housing land and particularly completed homes. It is incumbent on the SDPA to devise a plan which gives the best chance of achieving a step change in house completions by 2019 and then by 2024. The developers behind large developments in West Lothian are at considerable risk. Because the housing numbers were derived from calculations of historic need, no thought was given to what would be an economic scale of development standing the significant contributions to schools and other infrastructure required of the developers. The LDP should be set the task by SESplan and the SG of making further allocations of new housing land that will maximise output and thus instil confidence and make best use of the planned new infrastructure for which the developers have to pay.</p>

Response ID	Respondee	Summary
217	Strawson Property	Does not agree with Table 3.2. A greater proportion of the Additional Allowance should be directed towards East Lothian to reflect the higher demand for new housing within the East Lothian SDA compared with other SDAs.
227	Grange and Prestonfield Community Council (Mr Tony Harris)	Agree with Table 3.2.
231	Mr Jeff Chalmers	Does not agree with Table 3.2. Edinburgh does not need the new numbers of houses being suggested. These houses cannot be justified. There is no justification for placing Cammo within "West Edinburgh". The area does not have the road or school infrastructure to support such a proposal. Brownfield should be the first choice rather than the green belt.
235	The Cockburn Association (Ms Marion Williams)	Do not agree with Table 3.2 which would lead to unacceptable pressures on the Green Belt. West Edinburgh - The allocation has increased from 1,000 units to 2,700. As there are significant constraints in this area, it is not clear how the increase of 1,700 units is to be achieved - more land take (Green Belt)? - higher density? - combination of both? South East Edinburgh - The allocation has increased from 850 units to 2,500. Comments as for West Edinburgh SDA, with strong concerns as the scenic Edmonstone Hill. A701 Corridor - Allocation increased from 500 to 750, despite severe transport constraints, green belt damage and coalescence issues.
244	Kalewater Community Council	Agree with Table 3.2.
251	Mrs Carol Smith	Does not agree with Table 3.2. West Edinburgh - Bears a disproportionate share of proposed development. Brownfield sites in city centre not used. West Lothian and A701 corridor more suitable. Edinburgh City Centre - Brownfield sites and unused land in city centre should be used where infrastructure already in place - no allocation is made for these sites, why? A701 Corridor - Only 701 houses allocated, this area could absorb far more. West Lothian - Many areas in west Lothian are underused and of little landscape value. Areas of defunct industrial use could be rehabilitated.
254	Haddington and District Amenity Society (HADAS) (Chairperson)	Nothing to add. See Response 253.
262	Barratt and David Wilson Homes	Does not agree with Table 3.2. A reduced allowance within North Dunfermline and the Ore / Upper Leven Valley should be made due to deliverability concerns within the pre-2019 period. Several of the local authorities, namely Fife (additional 6,000 units), Edinburgh (additional 4,700 units) and East Lothian (additional 2,810 units) have all had to accommodate significant further housing in the period to 2024. However, notwithstanding the Spatial Strategy Assessment review the Guidance and Technical Note does not seem to infer significant new areas have been identified. The majority of the housing land allocations have already been identified in Midlothian and the Scottish Borders. The increased allowance for East Lothian is substantial but the majority of the area remains highly marketable and has the highest potential to deliver outwith Edinburgh. Additional allowances for West Lothian are acceptable based on balancing new sites with existing provision. Further medium scale sites are required to deliver the strategy. The main concern is Fife, where an additional 7,800 houses to 2024 are added, with significant deliverability concerns. The allowances for Edinburgh should be increased further in terms of North-West / South-West and the SDA areas. Supporting document submitted.
269	Savills	Does not agree with Table 3.2. As it is a more sustainable location, more housing should be directed to West Edinburgh. Flexibility should also be built in to allow for more housing at Edinburgh Waterfront should proposals for renewable energy port facilities not come forward as currently planned.
285	Mr Thomson	Does not agree with Table 3.2. The broad statement West Edinburgh hides the need to be more specific about the particular areas which have been identified. This area is green belt and should be protected.

Response ID	Respondee	Summary
287	Yeoman McAllister Architects (Mr Mark King)	Does not agree with Table 3.2. There are sites within and outwith Edinburgh that either have disused open space or have consents for a use which there is no demand. These sites could be used to increase housing supply and avoid greenbelt and countryside release. Sites closer to the airport and along local rail systems would provide a better solution for development than to ruin the East Coast and its village / golf course and coastal pattern. Distribution of East Lothian's allocation should be to other areas such as the Borders and Edinburgh's villages and west airport side. Obvious capacity exists between the existing north settlement boundary of Ratho and the M8.
291	Mr Jon Grounsell	Does not agree with Table 3.2. There is no mechanism in the system to stipulate density. Failing to build in the city centre at maximum density has massively adverse impacts on loss of greenfield land elsewhere and creates unsustainable transport patterns. Minimum density levels should be set throughout the Leith area and Granton at 4 - 5 storeys high. Opportunity to build on higher ground of low agricultural value to the South East of Rosewell. There is very limited capacity to build on the A701 corridor without damaging the separation between towns and high quality landscape - not recognised in the draft Midlothian LDP. Much greater focus on brownfield land is required.
304	Trustees of the Foxhall Trust (Mr Peter Carus)	Does not agree with Table 3.2. A significant proportion of land committed for housing in Edinburgh (and elsewhere in the SESplan area) is constrained, will be subjected to further delays and may not come forward at all. The need for only an additional 24,338 homes is questioned and is considered to be short of a more credible additional housing allowance needed to meet the overall housing land requirement and ensure the allocation of a generous land supply. Land in Kirkliston on the edge of the West Edinburgh SDA could help to deliver new housing.
309	EDI Brunstane Final	Does not agree with Table 3.2. SPP outlines the purpose of green belt designation. Consider that it is entirely appropriate at the point in the Development Plan cycle where strategic and local policy are under review, to undertake a more radical review of green belt boundaries. Brunstane, as a strategic site (up to 1,200 units) within the established South East Edinburgh SDA should be afforded a specific mention in the Supplementary Guidance. There is a strong policy presumption in SESplan that the SDAs are the priority locations for growth, in comparison to any areas outwith them. Strategic housing development should be located as close to Edinburgh as possible, in locations which are highly accessible by public transport, rather than further afield.
316	Straiton Parks Ltd (Mr Rob Snowling)	Does not agree with Table 3.2. Fully support the identification of land within the A701 corridor for 750 homes. However this scale of housing requirement fails to acknowledge the potential capacity of land at West Straiton (within the A701 corridor) to accommodate housing growth as part of a sustainable mixed-use development. We also consider that this scale of development is insufficient to deliver the A701 Bypass. The A701 Corridor SDA has significant capacity for additional residential development and its housing requirement should be increased to reflect this.
325	Friends of Cammo (Mr Simon Gillam)	Does not agree with Table 3.2. If the Edinburgh LDP continues to rule out areas south of the A8 for housing development, 2,700 new houses could not be accommodated in West Edinburgh SDA without adverse effects on Cammo Estate.
340	Mrs Carolyn Craig	Does not agree with Table 3.2.
365	Ogilvie Homes	Does not agree with Table 3.2. On the basis of the information which is set out both within the Guidance itself and its associated Technical Note, it is simply not possible to establish if the breakdown of the housing land requirement detailed in Table 3.2 is reasonable or otherwise. The Guidance, has significantly over estimated the contribution from constrained sites. The Guidance must set out a firm and positive commitment to the identification of new sites to augment the established supply in order to ensure that the <b>requirement to maintain, at all times, a generous supply of housing land can be met.</b>
371	Ashdale Land and Property	Does not agree with Table 3.2. On the basis of the information which is set out both within the Guidance itself and its associated Technical Note, it is simply not possible to establish if the breakdown of the housing land requirement detailed in Table 3.2 is reasonable or otherwise. The Guidance, has significantly over estimated the contribution from constrained sites. The Guidance must set out a firm and positive commitment to the identification of new sites to augment the established supply in order to ensure that the <b>requirement to maintain, at all times, a generous supply of housing land can be met.</b>



Response ID	Respondee	Summary
379	Mrs Elaine Hutchinson	Does not agree with Table 3.2. Development at any cost must be sustainable respecting the needs of the environment.
388	Mr Patrick Mitchell	Does not agree with Table 3.2. The additional allowances for Edinburgh appear contrary to the stated policy of focussing development in 3 main areas. The numbers for South and West Edinburgh should be reduced to the previous levels and the plan amended to encourage development across the city (rather than focussed in a few locations) to minimise infrastructure strain. The Guidance appears to focus on development at all costs to significantly expand Edinburgh, without clearly identifying the demand.
404	Mr John Watkins	Does not agree with Table 3.2. The West Edinburgh area should be hugely reduced in favour of all the other areas outwith Edinburgh where there is considerably more land available (if all these units are really necessary at all).
410	Burnside	Duplicate Response. See Response 408.
415	Juniper Green Community Council (Mr Neil Ingram)	Agrees with Table 3.2. The required extra numbers will be difficult to achieve, but at least these areas have access to the planned improvements to infrastructure necessary for significant development set out in the draft Local Plan.
420	The Crown Estate (Mr Robert Murphy)	Agree with Table 3.2. A response including supporting documentation related to Sites R3 and R5 within Rosewell was submitted to the Midlothian MIR process.
421	Mr Keith Doig	Does not agree with Table 3.2. There is no justification for Cammo being included in "West Edinburgh". There is very little regard for the lack of infrastructure and traffic issues which will result. Existing schools are already at full capacity. There is a huge number of brownfield sites available for building. The Cammo fields / estate are home to a great deal of wildlife, much of it endangered.
422	Mr James Poseley	Does not agree with Table 3.1. Intent on putting houses in West Edinburgh without proper consideration of the need for houses and infrastructure and environmental issues. The Cammo fields are a source of natural beauty and wildlife. Allocations should be made within Edinburgh City Centre and at Edinburgh Waterfront.
423	Mr James Poseley	Duplicate Response. See Response 422.
430	HPG Dalkeith Ltd	Does not agree with Table 3.2. It is not clear where the breakdown has emerged from. The refresh of the Spatial Strategy Assessment is subjective arbitrary and contradicts statements made in MIRs and Proposed LDPs. There are doubts as to the effective supply.
442	Old Road Securities Plc (Mr Robert Murphy)	Agrees with Table 3.2. A response was submitted to the Midlothian MIR process on Site G1 (Redheugh West).
443	Cramond and Barton Community Council (Dr Patricia Eason)	Does not agree with Table 3.2. The additional 2,700 units in West Edinburgh cannot be justified. The allocation would further exacerbate peak traffic congestion. Major investment in new primary and secondary school facilities will be required.
451	IBG Stakeholders (Mr. Peter Carus)	Does not agree with Table 3.1. A significant proportion of land committed for housing in Edinburgh (and elsewhere in the SESplan area) is constrained and will be subjected to further delays. The need for only an additional 24,338 homes is questioned and is considered to be short of a more credible additional housing allowance needed to meet the overall housing land requirement and ensure the allocation of a generous land supply. Land in West Edinburgh which could help to meet housing needs.
456	The Royal Bank of Scotland (RBS)	Does not agree with Table 3.2. RBS supports the identification of West Edinburgh as an SDA. A significant proportion of land committed for housing in Edinburgh (and elsewhere in the SESplan area) is constrained and will be subjected to further delays. The need for only an additional 24,338 homes is questioned and is considered to be short of a more credible additional housing allowance needed to meet the overall housing land requirement and ensure the allocation of a generous land supply. Land in West Edinburgh which could help to meet housing needs.
458	Firrhill Community Council (Mr James Napier)	Agree with Table 3.2. Need to consider whether the green belt should be retained or not. Continued erosion will lose all control.
464	Banks Group (Mr Alistair Landells)	Agree with Table 3.2. See Response 463.

Response ID	Respondee	Summary
467	Mrs Blythe Peart	Does not agree with Table 3.2. The additional allowance along the Borders Rail Corridor appears to be minimal. There are greater opportunities to build-in capacity for additional housing, than with the ECML which only has capacity in its current form for the next 12 years.
470	Miller Homes East Scotland Ltd	Does not agree with Table 3.2. The settlement of Crossgates is located in neither the Fife SDAs. The Ore / Upper Leven Valley SDA is focused on a corridor that would not be attractive to house builders.
483	Strutt and Parker (Mr John Wright)	Agree in part with Table 3.2. The displacement of housing numbers from Edinburgh is not properly justified. Are supportive of the identification of SAA 9.
497	Persimmon Homes East Scotland (Mr Gordon Johnson)	Does not agree with Table 3.2. The numbers are not clearly justified. On what basis has the reprogramming of brownfield land in Edinburgh taken place? There is no evidence to state how the constrained supply has been calculated. If aiming to deliver a generous supply the housing land requirement should be higher by up to 20%.
502	Miss Sally McKenzie	Does not agree with Table 3.2. Existing brownfield sites appear to have been left out of the equation. There appears to be a significant disparity between the breakdown required for Fife and other regions. Fife should have less do a burden than that currently allocated.
509	Stewart Milne Homes C/o Holder Planning	Does not agree with Table 3.2. This approach is potentially-misleading. The SDP should simply set out the housing requirement to be met. The task of demonstrating how the requirements can be met should fall to the LDP. The Guidance makes unsubstantiated assertions about constrained sites and potential windfall contributions. Paragraph 3.9 does not accord with SDP Policy 7 as amended by Ministers.
515	Aberdour Community Council	No specific opinion.
521	Wallace Land Investment & Management	Does not agree with Table 3.2. Including these figures goes beyond what is required by SPP and SDP Policy 5. It could be concluded that Table 3.2 is deleted although it does have value in providing guidance on the location of future allocations. However there is concern that these Additional Allowances are misinterpreted as housing land shortfalls. There is a risk that each LDP could interpret the Additional Allowances as the maximum land to be allocated. Recommend the addition of three SDAs - North West Edinburgh (1,000 homes), South West Edinburgh (1,500 homes) and the Fife Bridgehead. The latter would include towns such as Limekilns, Rosyth, North Queensferry, Inverkeithing and Dalgety Bay and have an allocation of 2,170 homes. The 2,170 would be made up of 950 deducted from the Outwith SDA Allowance and 1,220 deducted from the Ore / Upper Leven Valley SDA. Supporting document including proposed modifications submitted.
531	Murray Estates C/o Holder Planning	Does not agree with Table 3.2 since it contains information that goes beyond SDP Policy 5 or what is required of an SDP. It is for LDPs to demonstrate how the housing land requirement should be met. The identification of 'Additional Allowances' both within and outwith the Strategic Development Areas is both premature and inappropriate. 13% of SESplan's total housing land requirement and 16% of the established housing land supply is proposed to be provided for by constrained sites. This approach is entirely unsubstantiated and presents a very significant risk to achieving a generous land supply. Counting windfall sites is in direct contradiction of PAN 2/2010. Table 3.2 should be deleted.
534	Hallam Land Management	Does not agree with Table 3.2. Including these figures goes beyond what is required by SPP and SDP Policy 5. It could be concluded that Table 3.2 is deleted although it does have value in providing guidance on the location of future allocations. However there is concern that these Additional Allowances are misinterpreted as housing land shortfalls. There is a risk that each LDP could interpret the Additional Allowances as the maximum land to be allocated. Recommend the addition of three SDAs - North West Edinburgh (1,000 homes), South West Edinburgh (1,500 homes) and the Fife Bridgehead. The latter would include towns such as Limekilns, Rosyth, North Queensferry, Inverkeithing and Dalgety Bay and have an allocation of 2,170 homes. The 2,170 would be made up of 950 deducted from the Outwith SDA Allowance and 1,220 deducted from the Ore / Upper Leven Valley SDA. Supporting document including proposed modifications submitted.

Response ID	Respondee	Summary
542	Taylor Wimpey C/o Holder Planning	Does not agree with Table 3.2 since it contains information that goes beyond SDP Policy 5 or what is required of an SDP. It is for LDPs to demonstrate how the housing land requirement should be met. The identification of 'Additional Allowances' both within and outwith the Strategic Development Areas is both premature and inappropriate. 13% of SESplan's total housing land requirement and 16% of the established housing land supply is proposed to be provided for by constrained sites. This approach is entirely unsubstantiated and presents a very significant risk to achieving a generous land supply. Counting windfall sites is in direct contradiction of PAN 2/2010. Table 3.2 should be deleted.
553	Ashfield Commercial Properties Ltd	The greatest challenge lies at the local level where sites for these additional allowances must be found. Concur with the view that those authorities best placed, strategically to deliver additional housing, take a proportion of the City's need and demand in addition to meeting their own housing need and demand, such as East Lothian. As no significant brownfield sites have been identified, greenfield sites have to be included. Goshen Farm is located within the East Lothian SDA and can accommodate up to 1,200 units. The site can come forward now in order to help East Lothian Council maintain a five years' effective housing land supply.
559	Mr Nick Lansdell	Does not agree with Table 3.2. The numbers will put pressure on green field sites within West Lothian. There should be a presumption against large scale development which impacts adversely upon communities and support for small scale affordable development. The numbers should be reduced and there should be a presumption against large development against community wishes. Economic sites should be protected.
567	Morrison	Does not agree with Table 3.2. Object to the inclusion of Green Belt land. Brownfield sites should be prioritised along with additional development opportunities along the tram corridor. No justification has been given for Cammo being included in West Edinburgh.
572	Scottish Property Federation (Mr David Melhuish)	Does not agree with Table 3.2. The Additional Allowances in West Edinburgh and A7 / A68 / Borders Rail Corridor could be increased and may need to be in order to make up for the expectation that the waterfront will not deliver as expected by Edinburgh.
574	Mrs Christine Briffitt	Does not agree with Table 3.2. The allocation of numbers is disproportionately high for Fife. Fife has seen a huge amount of development in the last 10 years. The infrastructure is not in place particularly Outwith SDAs. The allocation of houses in small coastal villages and other areas of special interest should be avoided at all costs.
578	Mr Archibald Clark	Any encroachment into Green Belt / undeveloped land must be avoided until land for future agricultural production can be protected. Densities should be increased and the Scottish Government must provide incentives.
589	Cadzow Estate	Does not agree with Table 3.2. Do not agree that West Lothian is in any way self-contained. Concerned that the provision of sufficient housing to supply the 'cross Plan' requirement created by the Gyle / Airport / Newbridge / Livingston employment corridor has not been adequately addressed.

Response ID	Respondee	Summary
<b>Question 4 - Do you agree with the additional allowances outwith Strategic Development Areas as shown in Table 3.2 of the Supplementary Guidance? Do you have any further comments on the additional allowances outwith Strategic Development Areas set out in Table 3.2 of the Supplementary Guidance?</b>		
15	Alfred Stewart Properties Ltd	<p>Paragraph 3.10 - The SDP should be locationally specific as where such allocations outwith SDAs should be made. The figures in Table 3.2 are too low. 'Additional Allowances' should be renamed 'Additional Requirement' to comply with the SDP and SPP.</p> <p>Paragraph 3.13 - The Member Authorities should not use housing completion rates as a means of avoiding allocations responsibilities. If sufficient land is allocated in the right places, development rates will increase. Section 4 of the Technical Note clearly demonstrates that the surrounding areas to Edinburgh are a major attraction to house buyers leaving the City. This is due to a lack of affordable family housing within the City. Table 4.1 of the Technical Note is misleading. The Table tries to compare average completion rates from 2004 - 2012 against a requirement that starts in 2009. Replacement figures for Table 4.1 submitted. The replacement figures demonstrate additional land / planning consents must come forward on land that is deliverable in the short term to increase annual completion rates. The increase in the additional allowance outwith SDAs in Fife is welcomed. Further detail is required in support of Table 6.2 of the Technical Note. There would appear to be no detailed technical analysis of need and demand as it relates to accessibility or weighting given to any of the factors considered. Paragraph 6.5 of the Technical Note refers to SDP2. If this information is available it should be applied to SDP1 through this Supplementary Guidance. The Guidance and Technical Note appear to be ignoring the reality of the housing market in the SESplan area.</p>
21	Regenco (Trading) Ltd	<p>Paragraph 3.10 - There is no mechanism within the SDP that allows the separation of within and outwith SDAs. SDP Policy 7 allows for land to come forward outwith SDAs only to maintain a five year housing land supply. Concern has previously been raised that West Lothian is a stand alone SDA. The Winchburgh secondary school will be delivered in 2017 / 2018, as such Winchburgh is an inherently deliverable location for new residential development. The figures in Table 3.2 are too low. 'Additional Allowances' should be renamed 'Additional Requirement' to comply with the SDP and SPP. Paragraph 3.13 - The Member Authorities should not use housing completion rates as a means of avoiding allocations responsibilities. If sufficient land is allocated in the right places, development rates will increase. Section 4 of the Technical Note clearly demonstrates that the surrounding areas to Edinburgh are a major attraction to house buyers leaving the City. This is due to a lack of affordable family housing within the City. Table 4.1 of the Technical Note is misleading. The Table tries to compare average completion rates from 2004 - 2012 against a requirement that starts in 2009. Replacement figures for Table 4.1 submitted. The replacement figures demonstrate additional land / planning consents must come forward on land that is deliverable in the short term to increase annual completion rates. The increase in the additional allowance outwith SDAs in Fife is welcomed. Further detail is required in support of Table 6.2 of the Technical Note. There would appear to be no detailed technical analysis of need and demand as it relates to accessibility or weighting given to any of the factors considered. Paragraph 6.5 of the Technical Note refers to SDP2. If this information is available it should be applied to SDP1 through this Supplementary Guidance. The Guidance and Technical Note appear to be ignoring the reality of the housing market in the SESplan area. Paragraph 5.39 of the Technical Note notes that there remain issues of infrastructure and environmental constraints along the M9 Corridor (Area 6) in settlements including Linlithgow, Livingston and Winchburgh. Infrastructure is being implemented in phases. West Lothian is capable of accommodating further strategic growth beyond that which the Supplementary Guidance suggests.</p>
29	Liberton and District Community Council (Mr Jim Henry)	<p>If paragraph 3.10 is not amended, it could result in the allocation of land for up to 2,500 houses split between West Edinburgh and South East Edinburgh, the proposal in Table 3.2 is not the preferred option of Liberton and District Community Council. The Council considers that to accommodate the 2,500 houses outwith the existing SDAs SESplan should identify another SDA to facilitate meeting this land requirement. An alternative would be to require that the allocation be met from sites dispersed throughout City of Edinburgh Council area and directed by means of a hierarchy of development starting firstly with brownfield land, then to non-prime agricultural land, then land outwith the Green Belt.</p>

Response ID	Respondee	Summary
45	Scottish Natural Heritage (Ms Vivienne Gray)	Agree with Table 3.2. No further comment.
53	Dr Tom Slater	Does not agree with Table 3.2. Empty homes should be made available.
67	Gladman Developments (Simon Dean)	Agree with Table 3.2. Would wish to see that the wording, particularly in paragraph 3.10 remains as shown in the draft. Currently, the 'outwith-SDA' requirements set out in table 3.2 are referred to as 'suggestions' and the levels are described as 'indications'. This approach is consistent with the flexibility requirements of SESplan (specifically policies 6 and 7), SPP and draft SPP. The wording in paragraph 3.11 reinforces this and should not be diluted.
80	SEPA (Mr Paul Lewis)	SEPA cannot answer these questions confidently until an SFRA is completed and the distribution of housing land identified in Table 3.1 tested against it. Flooding and water management is of concern.
86	Musselburgh Conservation Society (Mr Barry Turner)	Agree with the Outwith SDA's section of Table 3.2.
102	Mr Grant McCulloch	Does not agree with the Outwith SDA allowances. The extra should be proportionate across the whole SESplan area, and not restricted to these 3 areas.
115	Murieston Community Council (Mr Davidson McQuarrie)	Does not agree with the Outwith SDA allowances. These allowances should be better defined as the SDAs.
133	Banks Group (Mr Alistair Landells)	Agrees with Table 3.2.
138	Cruden homes / Land Options East	Have no disagreement in principle to the additional allowances which have been identified outwith the SDAs but question the wisdom of confining such allowances to the City of Edinburgh, Fife and the Scottish Borders Council Areas. There are many small sites throughout the SESplan area which are capable of contributing towards the strategic housing land supply and would help to maintain the required five year supply of effective housing land. Major strategic sites are slow to deliver and need to be supplemented by smaller and more immediately deliverable sites such as those at Gullane. Such sites would also ensure a greater choice and range of house building opportunities across the area. It is suggested that additional allowances be identified outwith SDAs for not only East Lothian but also Midlothian and West Lothian.
141	Mr Alan Harrison	Does not agree with the Outwith SDA Allowances in Table 3.2. See Response 140.
147	Dr Simon Jackson	Does not agree with the Outwith SDA Allowances in Table 3.2. See Response 145.
167	Mactaggart & Mickel (Homes) Ltd (Mr Ken Hopkins)	Agree with Outwith SDA Allowances in Table 3.2, but consider they are not enough. Supporting document submitted. There is no evidence to back up the assumptions made on windfall and constrained supply. Increasing densities as a mathematical exercise is simplistic.
173	Scottish Government (Mrs Roseanne Leven)	Agree with Table 3.2. Content, subject to your responses to questions 5 and 6 (Responses 174 and 175)

Response ID	Respondee	Summary
180	Mansell Homes	<p>Does not agree with Table 3.2. The approach set out within paragraph 3.4 appears reasonable and generally in line with SPP and the Scottish Government's determination related to the Proposed Plan. However, where brownfield land is not available / sufficient / deliverable and where there is no reasonable prospect of delivering additional development of the scale required within the necessary timeframe in some / many of the existing SDAs, then it is utter folly to seek to base land use planning strategy/policy on such an approach. There is a need to look more constructively at the delivery of sites in the short / medium term in order to support / supplement delivery from those SDAs that can contribute to meeting housing need within the identified timescale. A number of SDA locations remained significantly constrained and adding more allocations is not an appropriate response. Additional allocations in both Fife and East Lothian are considered appropriate and this has been reflected to some extent within Table 3.2. It remains unclear how these figures were reached and how the breakdown between development within and outwith SDAs has been calculated, particularly in Fife. A higher level of allocation in East Lothian and Fife is fully justified. Albeit the SDA/non-SDA breakdown in Fife is inappropriate and not supporting of delivery objectives. While there remains merit is allocations in and around Dunfermline the same cannot be concluded in respect of the Ore / Upper Leven Valley. There is already land for many thousands of units allocated in this area with little development progress. A significant proportion, if not all, of the additional 3,220 units proposed within the Ore / Upper Leven Valley allocation should be for sites outwith the SDAs There are many smaller settlements in accessible parts of Fife with capacity.</p>
186	TMS Planning Services	<p>The approach set out within paragraph 3.4 appears reasonable and generally in line with SPP and the Scottish Government's determination related to the Proposed Plan. However, where brownfield land is not available / sufficient / deliverable and where there is no reasonable prospect of delivering additional development of the scale required within the necessary timeframe in some / many of the existing SDAs, then it is utter folly to seek to base land use planning strategy/policy on such an approach. There is a need to look more constructively at the delivery of sites in the short / medium term in order to support / supplement delivery from those SDAs that can contribute to meeting housing need within the identified timescale. A number of SDA locations remained significantly constrained and adding more allocations is not an appropriate response. Additional allocations in both Fife and East Lothian are considered appropriate and this has been reflected to some extent within Table 3.2. It remains unclear how these figures were reached and how the breakdown between development within and outwith SDAs has been calculated, particularly in Fife. A higher level of allocation in East Lothian and Fife is fully justified. Albeit the SDA/non-SDA breakdown in Fife is inappropriate and not supporting of delivery objectives. While there remains merit is allocations in and around Dunfermline the same cannot be concluded in respect of the Ore / Upper Leven Valley. There is already land for many thousands of units allocated in this area with little development progress. A significant proportion, if not all, of the additional 3,220 units proposed within the Ore / Upper Leven Valley allocation should be for sites outwith the SDAs There are many smaller settlements in accessible parts of Fife with capacity.</p>

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192	Campion Homes	Does not agree with Table 3.2. The approach set out within paragraph 3.4 appears reasonable and generally in line with SPP and the Scottish Government's determination related to the Proposed Plan. However, where brownfield land is not available / sufficient / deliverable and where there is no reasonable prospect of delivering additional development of the scale required within the necessary timeframe in some / many of the existing SDAs, then it is utter folly to seek to base land use planning strategy/policy on such an approach. There is a need to look more constructively at the delivery of sites in the short / medium term in order to support / supplement delivery from those SDAs that can contribute to meeting housing need within the identified timescale. A number of SDA locations remained significantly constrained and adding more allocations is not an appropriate response. Additional allocations in both Fife and East Lothian are considered appropriate and this has been reflected to some extent within Table 3.2. It remains unclear how these figures were reached and how the breakdown between development within and outwith SDAs has been calculated, particularly in Fife. A higher level of allocation in East Lothian and Fife is fully justified. Albeit the SDA/non-SDA breakdown in Fife is inappropriate and not supporting of delivery objectives. While there remains merit in allocations in and around Dunfermline the same cannot be concluded in respect of the Ore / Upper Leven Valley. There is already land for many thousands of units allocated in this area with little development progress. A significant proportion, if not all, of the additional 3,220 units proposed within the Ore / Upper Leven Valley allocation should be for sites outwith the SDAs. There are many smaller settlements in accessible parts of Fife with capacity.
198	Muir Homes	Does not agree with Table 3.2. The approach set out within paragraph 3.4 appears reasonable and generally in line with SPP and the Scottish Government's determination related to the Proposed Plan. However, where brownfield land is not available / sufficient / deliverable and where there is no reasonable prospect of delivering additional development of the scale required within the necessary timeframe in some / many of the existing SDAs, then it is utter folly to seek to base land use planning strategy/policy on such an approach. There is a need to look more constructively at the delivery of sites in the short / medium term in order to support / supplement delivery from those SDAs that can contribute to meeting housing need within the identified timescale. A number of SDA locations remained significantly constrained and adding more allocations is not an appropriate response. Additional allocations in both Fife and East Lothian are considered appropriate and this has been reflected to some extent within Table 3.2. It remains unclear how these figures were reached and how the breakdown between development within and outwith SDAs has been calculated, particularly in Fife. A higher level of allocation in East Lothian and Fife is fully justified. Albeit the SDA/non-SDA breakdown in Fife is inappropriate and not supporting of delivery objectives. While there remains merit in allocations in and around Dunfermline the same cannot be concluded in respect of the Ore / Upper Leven Valley. There is already land for many thousands of units allocated in this area with little development progress. A significant proportion, if not all, of the additional 3,220 units proposed within the Ore / Upper Leven Valley allocation should be for sites outwith the SDAs. There are many smaller settlements in accessible parts of Fife with capacity.
211	Aithrie Estates	Does not agree with Table 3.2. The inclusion of an additional 2,500 homes in Edinburgh is inappropriate. It will lead to further pressure to develop on present Green Belt. There is no Green Belt in West Lothian.
218	Strawson Property	Agree with the Outwith SDA's section of Table 3.2.
226	Grange and Prestonfield Community Council (Mr Tony Harris)	Agree with Table 3.2. See also the response to Question 7 for further comment (Response 223).
236	The Cockburn Association (Ms Marion Williams)	Does not agree with Table 3.2. City of Edinburgh Outwith SDA - SSAs 9 and 11 - An additional 2500 units. How is this to be achieved without serious damage to the environment. Development in these locations is a departure from the concept of the SDP as approved by Ministers which sees the thirteen SDAs as the "primary locations for growth and development". There will be unacceptable implications for the Green Belt.
245	Kalewater Community Council	Agree with Table 3.2.

Response ID	Respondee	Summary
255	Haddington and District Amenity Society (HADAS) (Chairperson)	Nothing to add. See Response 253.
263	Barratt and David Wilson Homes	Does not agree with Table 3.2. Whilst a significant improvement, the allowances for Edinburgh should be increased further in terms of North-West/South-West as more marketable (and hence deliverable) locations than part of Fife's additional provision. Planned expansion of Rural West settlements aligned to improved bus service connections to rail and tram links should be embraced given proximity to employment / services in West Edinburgh. Supporting document submitted.
266	Historic Scotland	Historic Scotland has no specific comments to make in relation to the actual breakdown and distribution of the additional allowances within or outwith the SDA's. Would note that the allocation of additional housing land within the SESplan area increases the potential for impacts on the historic environment which will require to be reviewed during the site allocation process by the relevant Local Authorities in the preparation of their LDP's.
276	Dr David Malton	Does not agree with Table 3.2. Fife has been disproportionately targeted. Small villages will be negatively economically impacted by development. Aberdour relies on it's beauty to attract visitors, not traffic and sprawling developments.
284	Mr Thomson	Does not agree with Table 3.2. There is a greater need to create employment opportunities outwith Edinburgh. See Responses 283, 285 and 286.
296	Balerno Community Council (Mr Richard Henderson)	Does not agree with Table 3.2. Development outwith SDAs by definition cannot be strategic. If such development is deemed necessary then it must be sustainable. The criteria for assessing suitability for further development clearly show South West Edinburgh to be unsuitable. Balerno and Currie have access to only one train station which is currently restricted. The A70 which runs through the villages is at capacity.
305	Trustees of the Foxhall Trust (Mr Peter Carus)	Does not agree with Table 3.2. Welcomes the additional allowances outwith SDAs but understand the figures are based on Seaplane's appraisal of how much additional land can be accommodated within the SDAs. As noted in responding to Question 3 (Response 304), allocated sites within SDAs may well be constrained and their delivery stalled accordingly. Caution is required in terms of potential over-reliance on allocated sites that might not achieve delivery of new housing targets.
310	EDI Brunstane Final	Does not agree with the Outwith SDA Allowances within Table 3.2. The strategy to depart from established SDAs is not sufficiently justified. Suggest that the Outwith SDA figures should be re-appraised, with a closer examination of the SDA first principle. Maximising the capacity of the SDAs will enable demand to be met closer to where it is generated, reduce travel and better relate housing to employment opportunities.
317	Straiton Parks Ltd (Mr Rob Snowling)	Does not agree with the proposed additional allowances outwith Strategic Development Areas. Any additional allowances should be directed to the SDAs (in particular the A701 corridor) before being distributed to Local Development Plan areas outwith the SDAs.
341	Mrs Carolyn Craig	Does not agree with Table 3.2.
346	Mrs Gertrud Mallon	Does not agree with Table 3.2. The allocation for the rest of Fife (outwith SDAs) is far too big given the state of the transport network, the environmental issues (especially the impact on Landscape/Townscape, cultural heritage etc.
353	Mrs Anna Purdie	Does not agree with Table 3.2. Fife has been given a disproportionate amount of the new proposed house allocation for its landscape. The cultural heritage that the area has to offer will be lost. The transport networks will also not be able to cope with the influx of housing in the area.
359	Mr Alan Pithie	Does not agree with Table 3.2. There is clear evidence that the existing road systems within Edinburgh cannot cope with the present populations' needs. There is also a lack of facilities for these communities. No further housing allowances should be granted on the West side of Edinburgh. It would be wrong to allocate land within Cammo when are no plans to balance that removal of land with any improvement to roads and facilities.
362	Mr Kenneth Murray	Does not agree with Table 3.2. The consequences of giving into development pressure outwith SDAs will be very significant for the character of Fife villages and tourist / visitor businesses.



Response ID	Respondee	Summary
366	Ogilvie Homes	Does not agree with Table 3.2 since it seeks to place a limitation on the amount of housing land that can come forward on sites, which lie outwith the identified SDAs. In view of SDP Policy 7 there is no policy basis upon which to justify any restriction in the amount of land that can potentially come forward on sites falling outwith an SDA. The wording of paragraph 3.9 must be changed to conform with Policy 7. Fife is considered to be the least well placed to accept further growth over and above that which relates to the SDAs. The allocation set against Fife should be deleted from Table 3.2, with the allocation of 1,950 units being reallocated to more appropriate locations.
372	Ashdale Land and Property	Does not agree with Table 3.2 since it seeks to place a limitation on the amount of housing land that can come forward on sites, which lie outwith the identified SDAs. In view of SDP Policy 7 there is no policy basis upon which to justify any restriction in the amount of land that can potentially come forward on sites falling outwith an SDA. The wording of paragraph 3.9 must be changed to conform with Policy 7. Fife is considered to be the least well placed to accept further growth over and above that which relates to the SDAs. The allocation set against Fife should be deleted from Table 3.2, with the allocation of 1,950 units being reallocated to more appropriate locations.
389	Mr Patrick Mitchell	Does not agree with Table 3.2. Development is disproportionately concentrated on two areas in Edinburgh. The numbers at West Edinburgh require greenbelt land for nearly all of the housing units required.
392	Mr Michael Fenner	Does not agree with Table 3.2. The Fife outwith SDAs allowance is disproportionately high in relation to it's current population, expected demand levels and availability of suitable sites. Would suggest that allowances outwith SDAs should not be included at this time. Further suitable brownfield sites within already designated SDAs will become available to any augment any shortfall if required.
395	Mrs Caitlin Hamlett	Does not agree with Table 3.2. The proposed additional allowances have already led to an unprecedented rate of speculative planning applications in highly unsustainable locations. Paragraph 5.20 of the Technical Guidance states that South West Edinburgh (Ratho, Juniper Green, Currie, Balerno and Hermiston) has the potential to accommodate development on a strategic scale. However the criteria for assessing suitability show the area to be unsuitable.
405	Mr John Watkins	Does not agree with Table 3.2. No space available for any more development without using parks and greenbelt.
416	Juniper Green Community Council (Mr Neil Ingram)	Does not agree with the Outwith SDA Allowances within Table 3.2. The areas which would need to be developed are located away from sites which have the best infrastructure. Even developments of 100 houses would put considerable strain on existing transport links, local schools and other amenities. The best possible use should be made of brownfield sites, and any development elsewhere needs to be properly planned with adequate road and public transport provision.
424	Mr James Poseley	Does not agree with Table 3.2. There is no strong link to future employment possibilities. Surely it makes more sense to increase regional centres and areas outside of cities to support the growth of Scotland.
431	HPG Dalkeith Ltd	Does not agree with Table 3.2. It is not evident how the refresh has weighted economic and other benefits of delivery against environmental impact or how this is reflected in the distribution of additional allocations. The refresh has significant serious deficiencies and is purely qualitative, subjective and value laden. Densifying existing allocations cannot be assumed to be automatically the case. It is not evident how the principles for identifying allocations within and outwith SDAs have been undertaken.
432	Mrs Susan Warwick	Does not agree with Table 3.1. The allocation for housing units for West Edinburgh is not feasible. The road systems are at capacity.
459	Firrhill Community Council (Mr James Napier)	Does not agree with Table 3.2. Brownfield sites should be developed first and then, if necessary, consideration be given to releasing more greenfield land for housing development, within the parameters set out in the approved Edinburgh LDP.
471	Miller Homes East Scotland Ltd	Does not agree with Table 3.2. Agrees with the identification of 1,950 additional units provided that the figure is justified in terms of the HNDA. However, it will be important that these units are allocated in the right place and on sites that are effective and therefore deliverable.

Response ID	Respondee	Summary
473	Mrs Blythe Peart	Does not agree with Table 3.2. Scottish Borders allowance could be increased due to new purpose built rail link in the Borders Rail Corridor.
484	Strutt and Parker (Mr John Wright)	Agree with the Outwith SDA Allowances within Table 3.2, although the heading is misleading implying that these figures are in addition. Supportive of the identification of a requirement for delivery outwith SDAs as this will introduce a range and choice of location for housing but remain concerned about the displacement of housing away from the City.
490	Dr Caroline Richie	Does not agree with Table 3.2. Concerned that the allocation of further land for housing development in rural South West Edinburgh will result in development in unsustainable locations resulting in increased car use. This will result in further congestion on roads that are at capacity.
491	Dr Caroline Richie	Duplicate response. See Response 490.
498	Persimmon Homes East Scotland (Mr Gordon Johnson)	Does not agree with Table 3.2. The numbers are not clearly justified. On what basis has the reprogramming of brownfield land in Edinburgh taken place? There is no evidence to state how the constrained supply has been calculated. If aiming to deliver a generous supply the housing land requirement should be higher by up to 20%.
503	Miss Sally McKenzie	Does not agree with Table 3.2. It is inconceivable that Fife has been allocated an additional allowance of 1,950 and the Scottish Borders only 80. No explanation has been given for this. Fife should receive less of the allocation considering its size compared to the Scottish Borders.
508	Stewart Milne Homes C/o Holder Planning	Does not agree with Table 3.2. This approach is potentially-misleading. The SDP should simply set out the housing requirement to be met. The task of demonstrating how the requirements can be met should fall to the LDP. The Guidance makes unsubstantiated assertions about constrained sites and potential windfall contributions. Paragraph 3.9 does not accord with SDP Policy 7 as amended by Ministers.
516	Aberdour Community Council	Does not agree with Table 3.2. The figure for Fife is disproportionate. Only City of Edinburgh, Fife and Borders are included in this category – why? 80 for the whole of the Borders region is hardly worth mentioning.
523	Wallace Land Investment & Management	Does not agree with Table 3.2. Including these figures goes beyond what is required by SPP and SDP Policy 5. It could be concluded that Table 3.2 is deleted although it does have value in providing guidance on the location of future allocations. However there is concern that these Additional Allowances are misinterpreted as housing land shortfalls. There is a risk that each LDP could interpret the Additional Allowances as the maximum land to be allocated. Recommend the addition of three SDAs - North West Edinburgh (1,000 homes), South West Edinburgh (1,500 homes) and the Fife Bridgehead. The latter would include towns such as Limekilns, Rosyth, North Queensferry, Inverkeithing and Dalgety Bay and have an allocation of 2,170 homes. The 2,170 would be made up of 950 deducted from the Outwith SDA Allowance and 1,220 deducted from the Ore / Upper Leven Valley SDA. Supporting document including proposed modifications submitted.
532	Murray Estates C/o Holder Planning	Does not agree with Table 3.2 since it contains information that goes beyond SDP Policy 5 or what is required of an SDP. It is for LDPs to demonstrate how the housing land requirement should be met. The identification of 'Additional Allowances' both within and outwith the Strategic Development Areas is both premature and inappropriate. 13% of SESplan's total housing land requirement and 16% of the established housing land supply is proposed to be provided for by constrained sites. This approach is entirely unsubstantiated and presents a very significant risk to achieving a generous land supply. Counting windfall sites is in direct contradiction of PAN 2/2010. Table 3.2 should be deleted.

Response ID	Respondee	Summary
536	Hallam Land Management	Does not agree with Table 3.2. Including these figures goes beyond what is required by SPP and SDP Policy 5. It could be concluded that Table 3.2 is deleted although it does have value in providing guidance on the location of future allocations. However there is concern that these Additional Allowances are misinterpreted as housing land shortfalls. There is a risk that each LDP could interpret the Additional Allowances as the maximum land to be allocated. Recommend the addition of three SDAs - North West Edinburgh (1,000 homes), South West Edinburgh (1,500 homes) and the Fife Bridgehead. The latter would include towns such as Limekilns, Rosyth, North Queensferry, Inverkeithing and Dalgety Bay and have an allocation of 2,170 homes. The 2,170 would be made up of 950 deducted from the Outwith SDA Allowance and 1,220 deducted from the Ore / Upper Leven Valley SDA. Supporting document including proposed modifications submitted.
543	Taylor Wimpey C/o Holder Planning	Does not agree with Table 3.2 since it contains information that goes beyond SDP Policy 5 or what is required of an SDP. It is for LDPs to demonstrate how the housing land requirement should be met. The identification of 'Additional Allowances' both within and outwith the Strategic Development Areas is both premature and inappropriate. 13% of SESplan's total housing land requirement and 16% of the established housing land supply is proposed to be provided for by constrained sites. This approach is entirely unsubstantiated and presents a very significant risk to achieving a generous land supply. Counting windfall sites is in direct contradiction of PAN 2/2010. Table 3.2 should be deleted.
549	Scottish Property Federation (Mr David Melhuish)	Agree with Table 3.2 and the direction of travel but would argue that further allowances should be identified across the region in order to compensate for shortfalls in anticipated delivery elsewhere (as is consistent with SPP).
554	Ashfield Commercial Properties Ltd	No Response.
560	Mr Nick Lansdell	Does not agree with Table 3.2. Developers are interested in developing premium housing in what is seen as highly marketable areas. This leaves other areas, who might otherwise benefit economically, undeveloped. It also creates pressure hotspots on infrastructure and diminishes quality of life in those areas.
568	Morrison	Does not agree with Table 3.2. Additional space should and must be found to avoid building on Green Belt Land in the SDAs particularly West Edinburgh and the Green Belt in Cammo. There must be more effort made to absorb, create and include development sites within the City.
575	Mrs Christine Briffitt	Does not agree with Table 3.2. The allocation for Fife Outwith SDAs is far too big given the state of the transport network and the environmental issues. Assessment of the traffic situation was a desk exercise. Amenities in the Aberdour part of Fife will not support an increase of housing as they are already stretched and poorly funded. Allocation of building land within Fife on Areas of Special Landscape Value will have a negative impact on the whole region.
579	Mr Archibald Clark	Does not agree with Table 3.2. A generous amount of land has already been identified under the Edinburgh LDP. Because developers dictate what are 'effective' sites, we are seeing a haphazard sprawl of housing that means that travel distances become extended in order to go to work, to shop, or to participate in leisure activities. Attention should be focused on developing existing brownfield land.
590	Cadzow Estate	Does not agree with Table 3.2. The proposed allocation of additional allowances appears to be contrary to established planning policy in that it has allocated in excess of 20% of the sites outwith SDAs. In addition to this West Lothian is allocated fewer allowances than West Edinburgh, Fife and East Lothian.
<b>Question 5 - Is the distribution of the housing land requirement including additional allowances, over the period to 2024, shown in Tables 3.1 and 3.2 of the Supplementary Guidance, deliverable? Please set out any comments.</b>		
16	Alfred Stewart Properties	Not deliverable. Should not expect constrained land to be fully delivered in plan period. Actual existing supply of housing land is smaller than set out in Technical Note. Housing Land Audit figures are flawed. No demand for flatted development at Edinburgh Waterfront and it is not a marketable location. Concern also over delivery of Blindwells and East Broxburn.
22	Regenco	Not deliverable. Should not expect constrained land to be fully delivered in plan period. Actual existing supply of housing land is smaller than set out in Technical Note. Housing Land Audit figures are flawed. No demand for flatted development at Edinburgh Waterfront and it is not a marketable location. Concern also over delivery of Blindwells and East Broxburn.

Response ID	Respondee	Summary
30	Liberton CC	Yes deliverable but insufficient road capacity to support housing in South East Edinburgh SDA.
34	Craigshill CC	Yes deliverable
37	Milesmark and Baldrige CC	Not deliverable due to lack of school and road investment in Dunfermline area.
46	SNH	Yes deliverable
54	Dr Tom Slater	Not deliverable in current economic environment.
60	Mr Scott Mackenzie	Yes deliverable and will create employment.
68	Gladman	Yes deliverable subject to reassessment of land supply and LDP preparation as required by SG.
77	SEPA	Flood risk should be addressed at the early stages of plan preparation.
87	Musselburgh Conservation Society	The requirement is not deliverable as developers are not deliver existing sites. In East Lothian there are infrastructure capacity issues and environmental constraints that will restrict development.
99	Cllr Dave Dempsey	No. Housing will be delivered if housebuilders see it in their best interests to deliver it. That will depend on economic factors, political decisions and a whole host of other things that no-one has foreseen.
106	Mr Grant McCulloch	Required development rates to meet requirement are not attainable. This is evidences by the number of sites currently not being developed.
116	Murieston Community Council	No. Infrastructure should be in place before any significant development
120	Mrs Sally Chambers	Current rates show that it is undeliverable.
125	Miss Carolyn Campbell	No. Question the need for further sites, such as Cammo, given the number of uncompleted sites across the city.
134	Banks Group	Given the level of investment required is clearly beyond the local authorities there would seem to be a need for a much greater level of investment from Scottish Government funding sources to allow for the provision of such essential infrastructure to be considerably greater than is the case at present. Priority should be given to within existing built up areas when allocating new sites for development
148	Dr Simon Jackson	No. West Edinburgh transport and education infrastructure cannot accommodate new development.
166	McTaggart & Mickel Homes	Yes but the additional allowances are not in the correct areas.
174	Scottish Government	Without a clear understanding of the phasing of development and infrastructure provision, the impact on the deliverability of development that may require additional infrastructure is unclear. The failure of the process so far to provide a resolution that is supported by all stakeholders and delivers a clear mechanism, or mechanisms, for addressing cross boundary transport issues and funding contributions, and a suite of interventions shown to be deliverable, at least in part by such mechanisms, means that the deliverability of the infrastructure that might be necessary to support the overall spatial strategy is questionable.
181	Mansell Homes	No due to the use of non-effective allocations. Housing development should be directed to marketable locations where people want to live.
187	TMS Planning Services	No. Compounding a failing strategy with additional non-effective allocations is a self-fulfilling prophesy of failure. The SG needs to breathe new life into the delivery process by directing development to marketable locations, to places people want to live.
193	Campion Homes	No. Compounding a failing strategy with additional non-effective allocations is a self-fulfilling prophesy of failure. The SG needs to breathe new life into the delivery process by directing development to marketable locations, to places people want to live.

Response ID	Respondee	Summary
199	Muir Homes	No. Compounding a failing strategy with additional non-effective allocations is a self-fulfilling prophesy of failure. The SG needs to breathe new life into the delivery process by directing development to marketable locations, to places people want to live.
202	Mr Peter Scott	Not deliverable. 2,500 houses at West Edinburgh are not deliverable due to transport infrastructure and education capacity constraints. The proposed solution to deal with these issues to accommodate growth will not be effective.
212	Airthrie Estates	Not deliverable. Plan making delays have led to a shortfall in delivery. Overspill from Edinburgh into Mid and East Lothian may be undeliverable. Winchburgh can accommodate and deliver further development.
219	Strawson Property	The distribution shown in Tables 3.1 and 3.2 is not deliverable over the period to 2024
225	Grange and Prestonfield Community Council	Unknown. Will required significantly higher delivery rates. Delivery of the requirements may have an unacceptable impact on the LDP.
237	Cockburn Association	Questions the delivery of land allocations because of: previous records of under achievement; uncertainty about whether HNDA is reliable; and considerable concern that a reasonable balance between housing land requirements and other important factors cannot be achieved. Currently delivery rates are significantly below those required. Required to monitor trends to ensure that environmental and landscape-sensitive areas are not prematurely or unnecessarily released for housing development.
246	Kalewater Community Council	Yes deliverable.
256	Haddington and District Amenity Society	Decisions made at appeal could have a considerable impact on specific towns and villages
264	Barratt and David Wilson Homes	Housing sites emerging through adopted LDP's will have just 3 years within which to contribute to the first demand period to 2019. Clearly, this will not deliver the pre-2019 housing numbers. The provision of new schools should be explicitly linked to housing programming to ensure that developers are not asked that new schools be in place on day one but instead, when housing programming indicates they will actually be required. New housing sites should be released now or allow housing requirements to be met.
270	Savills	No. There is an over reliance on many strategic sites which require significant infrastructure to be delivered.
271	Savills	Ensure that the principle of allowing housing development on sustainable locations is put into the document to allow additional sites to come forward over the plan period.
275	Mr Martin Bailey	The process of appeals, enquiries, etc seems not to have been taken into account. Delivery of land is only the beginning of the building process.
283	Mr Thomson	Yes if there is the will and finance to provide the infrastructure. It is not realistic to expect the developer and then the house buyer to bear the brunt of these costs.
292	Mr Jon Grounsell	The problem is not house building or land, but finance and credit.
297	Balerno Community Council	The required rate of delivery is not realistic in Edinburgh. The consequence will be half finished building sites as developers start development in order to comply with planning permissions, while delaying completions to maximise sale price.
311	EDI Brunstane	Not deliverable. The SG is drafted on the basis that a very significant increase in housing completion rates suddenly occurs, almost immediately. We question the realism of this premise, and advocate that a more pragmatic approach towards essential infrastructure improvements is needed to support the required transformation in completion rates. It is the house building industry's perception that it takes much longer to achieve planning permissions in Scotland than elsewhere in the UK, and the fact those consents are typically burdened to a greater level.
318	Straiton Parks Ltd.	The additional allowances within the A701 corridor are deliverable.
328	Mrs Ruth Schofield	Green Belt must be protected and alternative sites identified. Accessibility should be a key consideration.

Response ID	Respondee	Summary
367	Ogilvie Homes	Not deliverable. The Guidance should, on the issue of Delivery, restrict itself to considerations of meeting the assessed need and demand only. Housing should be allocated in areas where there is a demand for new housing.
373	Ashdale Land & Property	Not deliverable. The Guidance should, on the issue of Delivery, restrict itself to considerations of meeting the assessed need and demand only. Housing should be allocated in areas where there is a demand for new housing.
380	Mrs Elaine Hutchison	Proposed housing completion rates have not been delivered for 20 years and are unachievable. Proposed approach could lead to half completed sites. Housing completions is only one of 50 indicators towards national objectives. Other relevant indicators are Increase the proportion of journeys to work made by public or active transport; reduce traffic congestion; and reducing Scotland's carbon footprint. Pursuing the housing indicator may prevent the achievement of others. Making housing land available should consider: the required supply of enabling infrastructure- water, sewerage and roads; the recent recession and wider economy; and housing market conditions. This Measure also takes into account of conversions of existing buildings to housing use or refurbishment of dwellings. These opportunities must be explored before considering greenbelt and/or agricultural land.
385	Mr Patrick Mitchell	Not deliverable. There is sufficient housing units granted permission for 9 years supply without providing additional land (on historic average completion levels). Level of delivery required is undeliverable. The additional allowances will encourage speculative applications around the greenbelt to fulfil this requirement, without consideration to existing infrastructure, future requirements and impact of existing residents.
398	Mrs Caitlin Hamlitt	Not deliverable. The required delivery rates are unachievable. Attempting to meet the proposed high build rates will compromise the region's ability to meet these other key National Outcomes, while achieving deliverability will necessitate house building in unsustainable locations contrary to national policy.
406	Mr Jon Watkins	Not necessary and no space in Edinburgh
409	Burnside	Not deliverable due to significant backlog. Delivering required new schools and transport infrastructure will be difficult in financial climate.
417	Juniper Green Community Council	Note deliverable. Would require development on a scale that the building industry is unlikely to be able to support.
428	Mr James Poseley	Not deliverable due to the rates required before 2015 and the infrastructure required to support development. In particular, school extensions and new schools to provide the additional pupil places required to meet development need are seen as essential and must be delivered. Infrastructure and services in Cammo are already at capacity and the proposed transport and education solutions are not sufficient.
433	HPG Dalkeith	In general terms it is considered that effectiveness and delivery have not been taken into account as part of a strategy for recovery and sustainable economic growth. Too much non effective and constrained land is identified based on historic allocations with high servicing and infrastructure costs. This will erode land values and slow the pace of development. It is already clear that interim arrangements will need to be put into place to allow the housing market to operate in advance of LDPs being adopted. It is the HPG Dalkeith view that the targets for Shawfair will be facilitated by an additional release at Cauldcoats. Furthermore the deliverability in this and other SDAs is reliant on paying for infrastructure contributions and this is unlikely to happen without greater critical mass and further investment.
444	Cramond & Barnton Community Council	2,700 dwellings at West Edinburgh is not deliverable. The proposed infrastructure improvements will not achieve a 'no net detriment' situation. The development could not financially generate sufficient funds to developed the level of infrastructure required to accommodate the development.
460	Firrhill Community Council	No evidence to show that the delivery of housing on such a scale would be achieved within those timescales.
465	Banks Group	Questions deliverability of housing requirements in Edinburgh, Fife and East Lothian.
472	Miller Homes East Scotland	Allocating sites in the interim will not prejudice developing the remainder of SDAs.
475	Mrs Blyth Peart	Yes, subject to the development at Blindwells progressing.

Response ID	Respondee	Summary
485	Strutt & Parker	No. The SG does not direct enough requirements to marketable and deliverable locations. There has been an over reliance in constrained and non-effective sites. Use of a windfall allowance is contrary to Government guidance.
494	Dr Caroline Ritchie	Development is taking place too rapidly that it does not allow for reflection on the impacts. Affordable housing requirements are not being met due to a lack of finances. Another crash would lead to uncompleted sites around the country and many repossessions.
499	Persimmon Homes East Scotland	Depends on whether effective sites are allocated in LDPs and whether the supply is generous. The requirements for Scottish Borders will not be met due to a lack of market demand. Edinburgh should meet more demand. Housing targets should be set high when coming out of a recession. Plan delays should not restrain housing numbers.
510	Stewart Milne Homes	Not deliverable. The SDP should plan for 20 years and not focus on recent delivery rates. Edinburgh's commuting patterns are unsustainable. The SPDA should seek to meet housing need where it arises to prevent exacerbation of this. The distribution of the housing requirement is not in line with market evidence , particularly in Fife and Scottish Borders. This will lead to non delivery.
518	Aberdour Community Council	No comment
524	Wallace Land Investment & Management	Confidence in the effectiveness of the future land supply is an LDP matter and should be left to each LDP to resolve, dealing with its established land supply and assessing in detail the specific sites which can be delivered over its plan period in association with the house building sector and Homes for Scotland.
533	Murray Estates	Have significant reservations as to the deliverability of the housing land requirement over the period to 2024. These are based upon the SG's failure to adequately reflect patterns of demand and housing market trends when distributing the housing land requirement and the significant and inappropriate over-reliance on constrained and windfall sites within the established housing land supply. The Scottish Borders is an example of both by having a housing requirement that is significantly in excess of need there and including constrained sites to meet this.
537	Hallam Land Management	Confidence in the effectiveness of the future land supply is an LDP matter and should be left to each LDP to resolve, dealing with its established land supply and assessing in detail the specific sites which can be delivered over its plan period in association with the house building sector and Homes for Scotland.
544	Taylor Wimpey	Have significant reservations as to the deliverability of the housing land requirement over the period to 2024. These are based upon the SG's failure to adequately reflect patterns of demand and housing market trends when distributing the housing land requirement and the significant and inappropriate over-reliance on constrained and windfall sites within the established housing land supply. The Scottish Borders is an example of both by having a housing requirement that is significantly in excess of need there and including constrained sites to meet this.
552	Scottish Property Federation	Edinburgh Waterfront will not deliver as envisaged. Concerned that other allocations anticipated in the Supplementary Guidance will fail to be realised and that there could be a requirement for expansion in the corridor within/between Edinburgh and West Lothian alongside public transport links. There is already expected to be significant expansion in Midlothian but this may need to be revisited in conjunction with the Borders in order to capitalise on the Borders railway development.
555	Ashfield Commercial Properties LTD	We support the additional allowance of 3,565 units to the East Lothian Council Strategic Development Area (SDA) . We do, however, consider that there needs to be further flexibility with this additional allowance and that East Lothian Council will need to 'increase their allowance' to take some further units from the City of Edinburgh which is more constrained in policy and physical terms. Goshen Farm could significantly assist East Lothian Council in meeting this. It is of a sufficient scale to provide the required infrastructure and is sustainable sites.

Response ID	Respondee	Summary
561	Mr Nick Lansdell	Not deliverable. Liaise with local communities and Community Councils to ensure that development is sympathetic to local need and concern. Ensure concerns regarding greenfield development, infrastructure pressure and quality life are met. Ensure that economic land is not given up for short term housing gain. Ensure that local authorities are monitored and moderated and that conflicts of interest between planning matters and land ownership are removed in the case of Council own land. Promote small scale development. Actively promote development in those areas which will benefit economically and promote transformation planning which is green and sustainable. Actively promote affordable housing and encourage developers away from focusing on premium development.
569	Mr Morrison	The Cammo site should not be developed. The cumulative effect with other West Edinburgh sites will not be able to be accommodated by the transport network and education provision.
580	Mr Archibald Clark	The finance is not available to achieve the required delivery rates. Factory constructed, component development could lead to quicker rates of construction rather than traditional methods. This could allow for taller developments up 8 storeys.
591	Cadzow Estate	Not deliverable. The use of constrained sites will inhibit delivery and do not reflect areas of demand. West Lothian can deliver more homes, specifically the marketable eastern parts of West Lothian. Sites in West West Lothian is not as deliverable.
595	I&H Brown Limited	Seek that the SG is very clear in steering the local authorities on the importance of securing the strategic land allocations first and delivering any additional allocations only in locations which do not undermine this the existing SLA's. Support development of the Dunfermline Strategic Land Allocations.
<b>Question 6 - What can SESplan, the key agencies, developers and Scottish Government do to facilitate delivery of the strategic housing land requirement?</b>		
17	Alfred Stewart Properties	Strategic villages such as Crossford to the west of Dunfermline could accommodate significant growth with no impact on the proposed green belt for Dunfermline.
23	Regenco	Winchburgh has the environmental capacity to expand to the south using a discrete masterplanned approach taking into account local environmental factors and has demonstrated deliverability of development.
31	Liberton CC	All bodies should be involved in delivering road capacity to allow mitigate impact of development in and around Edinburgh.
38	Milesmark and Baldrige CC	Vacant property and land in Dunfermline Town Centre should be developed.
47	SNH	Can support through: assisting in delivery of green infrastructure in development; and supporting LDP, masterplan and development brief preparation.
55	Dr Tom Slater	Start again free of vested interests.
61	Mr Scott Mackenzie	Housing should be built to the highest efficiency and design standards.
69	Gladman	LDP preparation should not be delayed. 5 year land supplies must be maintained at all times. Infrastructure providers must be proactive in their roles to support development, including education authorities who should not use education capacity to restrict development.
76	SEPA	SEPA wishes to participate with SESplan, including on green networks and preparing a flood risk assessment.
88	Musselburgh Conservation Society	1. A commitment now to all the related transport and infrastructure improvements that are necessary to support the level of development proposed. 2. Clear and fair mechanisms put in place to require developers to contribute to the above. 3. Part of increased land values brought about by planning decisions to accrue to the state/local authorities for infrastructure provision. 4. Stop land-banking by imposing harsh financial penalties on developers who do it. 5. Significant increase in social housing provision. 6. Use compulsory purchase powers where allocated land is not coming forward for development.
94	Roslin & Bilston Community Council	Development should create pleasant environments. Each should be considered as if it were on decision makers doorsteps.



Response ID	Respondee	Summary
100	Cllr Dave Dempsey	This is an exercise being carried out by a small group of professionals without reference to the public whose lives will be affected by it
107	Mr Grant McCulloch	Need for a reappraisal of what Edinburgh people want. Development of existing sites should be incentivised. Protect the Green Belt.
117	Murieston Community Council	Scottish Government and developers must underwrite the necessary changes to the transport and strategic infrastructure.
121	Mrs Sally Chambers	Incentivise developers to deliver existing sites.
126	Miss Carolyn Campbell	Plans should enhance Edinburgh.
135	Banks Group	Need for innovative funding solutions for infrastructure. This should include TIF or similar.
142	Mr Alan Harrison	No. Incentivise brownfield development. Green belt, such as Cammo, should be preserved. It is home to many flora and fauna. Green Belt helps improve the environment for the local and adjacent communities. For anyone visiting the area it gives an excellent perception of the city.
149	Dr Simon Jackson	Brownfield sites should be developed. West Edinburgh should be developed near tram network.
151	Mr Colin Mackay	Within East Lothian West, consider further sites that do not adversely affect the area concentrated around Wallyford. Give greater weight to Blindwells. Consider the Cockenzie power station site as a significant brownfield site which could include the east most lagoon area at Prestongrange
165	McTaggart & Mickel Homes	The Scottish Government, SESPLAN and Local Authorities need to assist in the provision of infrastructure to deliver new housing. This should involve up front funding. LDP allocations need to be deliverable by the market.
175	Scottish Government	Transport Scotland would be in a position to engage with authorities to identify what mitigation might be appropriate to address the impact on the strategic transport network. It would then be possible to consider phasing of this mitigation, the levels of detriment that might be appropriate and to take an informed view on how cumulative impacts might be addressed through appropriate delivery mechanisms.
182	Mansell Homes	Too much of the existing supply is tied up in strategic land allocations which are not delivering at present. Effective land allocations are required to replace non-effective sites to be delivered over the plan period.
188	TMS Planning Services	Too much of the existing supply is tied up in strategic land allocations which are not delivering at present. Effective land allocations are required to replace non-effective sites to be delivered over the plan period.
194	Campion Homes	Too much of the existing supply is tied up in strategic land allocations which are not delivering at present. Effective land allocations are required to replace non-effective sites to be delivered over the plan period.
200	Muir Homes	Too much of the existing supply is tied up in strategic land allocations which are not delivering at present. Effective land allocations are required to replace non-effective sites to be delivered over the plan period.
213	Airthrie Estates	a) adjust the distribution proposed to favour areas of proven delivery, such as the east of West Lothian; b) make a specific allocation of additional land for the Winchburgh area; c) revisit the alleged infrastructure difficulties in the growth areas of West Lothian; d) accept the need to find a policy response to the qualitative dimension of need; e) looking to the post 2019 period, propose an Edinburgh City Region masterplan similar to those of proven longevity in several Scandinavian cities and historically around London; and f) speed up the review of SESplan
220	Strawson Property	1 Reassign the number of units to the East Lothian SDA as requested in these responses to meet demand and increase the prospects of a quicker recovery in the housing market within the SESplan area.2 Where brownfield opportunities are insufficient in any SDA, allocate greenfield sites in LDPs which adjoin the built-up areas of settlements. Owners or parties having control of these sites should be asked to demonstrate that the sites are effective and capable of delivering Housing units within the first period of the SDP i.e. up to 2019.
224	Grange and Prestonfield Community Council	Question the reason for delivering the strategic land requirement.

Response ID	Respondee	Summary
238	Cockburn Association	Need to deliver higher densities and the smaller dwelling types as required by the HNDA. This should be enforced through development management policies.
247	Kalewater Community Council	Build houses where there is a local need and not for the convenience of developers.
257	Haddington and District Amenity Society	1 Provide greater support for local authorities to review and consider the capacity of their areas before final decisions on housing numbers approved. 2 Block the ability of developers to gain approvals by appeal for non- determination. 3 Allow for further reviews of infrastructure requirements across the Plan area and not just considering requirements within individual local authority areas. There are significant links and co-ordinated improvements that could be made. Infrastructure requirements should also extend to consider the impact on existing Town centres. 4 Supporting Town Centres and the structure and operation of existing settlements must be linked to any decisions for new housing allocations. 5 Ensure process does not allow developments to come forward in piecemeal manner without suitable infrastructure improvements in place.
265	Barratt and David Wilson Homes	Failure to meet housing demand in the past has had implications for the scale of housing need over the next 10-20 years. Many large scale sites with infrastructure requirements have not delivered. Cannot wait until LDPs are adopted. In order to meet supply requirement interim guidance, such as in East Lothian, should be adopted. Local authorities and developers working together on bringing sites forward through interim guidance is far more advantageous and a better use of resources than a continued 'planning by appeal' approach.
277	Mr Martin Bailey	Fair and proper consultation to explain why the SESplan is necessary. Secondly, to offer land owners generous terms.
280	Dr David Mallon	Coastal villages should not be identified for new development.
288	Yeoman McAllister Architects	Many housing allocations do not take economic factors into account. Greater housing generosity, in and around the airport and Edinburgh's villages to the west will help facilitate the delivery of houses.
294	Mr Jon Grounsell	Delivery is dependent on finance and not land supply.
299	Balerno Community Council	There is a requirement for leadership by Scottish Government in particular rather than an unfortunate impression of abdication of responsibility. If Government wishes to abandon the Green Belt then it should say so; If not, and we have no reason to believe that it does, then it should stand up and say so.
303	Trustees of the Foxhall Trust	Consideration should be given to allowing preference to sites with identified market demand and to those that meet the effectiveness tests. Overestimation of the potential of the effective supply should be avoided.
312	EDI Brunstane	Further pragmatic and detailed dialogue with the SDPA an LPAs on delivery issues, up front infrastructure funding and provision of early phase works through funding that can be reimbursed by unit phases.
319	Straiton Parks Ltd.	SESplan, Key Agencies and Member Authorities can facilitate delivery of the strategic housing land requirement by taking a lead role in facilitating strategic infrastructure deliver. This infrastructure should be forward funded. Local Development Plans should be seen as business plans which demonstrate how enabling public investment can be used to attract private investment to an area and deliver growth.
329	Mrs Ruth Schofield	Consideration needs to be given to transport infrastructure, carbon footprint and the delivery rates of development. Is there a market for all these houses?
368	Ogilvie Homes	Development Plans must take account of what infrastructure can be delivered by the development industry. Developer contributions must be proportionate. As local authorities benefit from development they should fund infrastructure.
374	Ashdale Land & Property	Development Plans must take account of what infrastructure can be delivered by the development industry. Developer contributions must be proportionate. As local authorities benefit from development they should fund infrastructure.
381	Mrs Elaine Hutchison	Ensure housing land is in sustainable locations with the required infrastructure, meets all the desired National Outcome criteria as well as the planning principles
387	Mr Patrick Mitchell	More needs to be done to encourage brownfield developments. The current system encourages land banking.

Response ID	Respondee	Summary
399	Mrs Caitlin Hamlitt	Ensure that housing land is in sustainable locations in line with national planning policy, and that it meets all the desired National Outcome criteria. This will increase certainty for developers and communities and reduce the time and resource required for planning appeals.
407	Mr Jon Watkins	Need to justify need for housing and explain where matching jobs are.
411	Burnside	Infrastructure must be in place before development. Housing must be located where it is needed. Piecemeal development of large houses in unsustainable locations, such as Balerno, should not be supported. Developers must increase the housebuilding rate.
418	Juniper Green Community Council	Need to review housing need levels and the availability of all existing proposed sites, both brownfield and planned greenfield.
434	HPG Dalkeith	The SG must identify a generous supply of effective land in marketable areas where there is infrastructure capacity or this can be provided in accordance with Policy 7. The interim guidance provided by East Lothian and Fife is useful in this regard. Developers will respond to investment opportunities where these are well located and can be delivered in accordance with market demand. Where infrastructure constraints adversely affect land values without any public support the land will become unviable and ineffective. Agencies need to prioritise their Action Plan programmes and orientate these towards facilitating investment in preferred areas rather than spreading the budget too thinly.
435	Mr James Poseley	Plan should be started again with development focussed away from Green Belt and cities and towards growing regional towns and other areas.
445	Cramond & Barnton Community Council	Introduce a Land Tax on undeveloped brownfield sites. Provide the necessary infrastructure improvement funding, do not rely on this being achieved by development gain monies,
461	Firrhill Community Council	Scottish government and councils should promote and incentivise the development of brownfield sites.
474	Miller Homes East Scotland	Local authorities should work with developers when preparing plans. Allocated smaller sites unburdened by infrastructure requirements. Match public and private sector investment in infrastructure to deliver larger sites.
477	Mrs Blyth Peart	No comment.
486	Strutt & Parker	Allocate land in areas of need and demand. Identify, acknowledge, and resolve barriers and constraints to development rather than, as has been done here, avoiding them.
492	Dr Caroline Ritchie	The development of brownfield sites should be incentivised. Public sector land that is not required should be developed. The Government should increase the funding for social housing. Developers should not waste time and money by submitting applications that are contrary to government and plan aims.
500	Persimmon Homes East Scotland	Identify a generous land supply in the right places. Identify infrastructure funding solutions. Have can do attitude and allocate a generous supply of housing to meet the aspirations of a growing capital city. If SESplan and LDPs don't do this then the Scottish Government should. Key agencies to take the long term view on identifying infrastructure requirements.
504	Miss Sally Mackenzie	Consider using empty homes to meet need and develop brownfield sites.
511	Stewart Milne Homes	Housing need should be met where people want to live. Infrastructure investment costs should be shared between the public sector and the development industry. Development Plans should in effect be business plans showing how private investment can be attracted to an area with the assistance of enabling public investment.
520	Aberdour Community Council	Consult with appropriate experts in their fields, communicate and work as a team
525	Wallace Land Investment & Management	The inner boundary of the Edinburgh Green Belt should redefined in line with SPP. The additional capacity in East Lothian compared to previous positions is not explained.
535	Murray Estates	Allowances should be directed to where demand and need arise. Constrained sites in the allowances should be replaced with new effective sites in strong market locations. The refresh of the spatial strategy assessment contains little justification why West Edinburgh could not accommodate further development. Developing the Garden District would be more effective than redistributing the housing requirement further away in other local authority areas.

Response ID	Respondee	Summary
538	Hallam Land Management	The inner boundary of the Edinburgh Green Belt should be redefined in line with SPP. The additional capacity in East Lothian compared to previous positions is not explained.
545	Taylor Wimpey	Allowances should be directed to where demand and need arise. Constrained sites in the allowances should be replaced with new effective sites in strong market locations. Edinburgh, Midlothian and East Lothian have better prospects of housing delivery than Scottish Borders, which does not seem capable of delivering its requirement. The reasonable alternative sites in Midlothian are capable of delivery in the plan period.
556	Ashfield Commercial Properties LTD	Identify sites that are capable of delivery in the short to medium term and that are not burdened with overly restrictive infrastructure requirements or costs.
557	Scottish Property Federation	1. Review Edinburgh Waterfront with the consequences for non-delivery of its allocation acted on. 2. Push forward key public transport initiatives such as a new station in the Winchburgh development that is being delivered to market. 3. Agencies and Scottish Government should (continue) to pump prime infrastructure developments or improvements in key sites. Education and Transport appear to be the major constraints. A continued policy of seeking to phase where possible such infrastructure requirements would appear to be a sensible way forward.
562	Mr Nick Lansdell	Same as 562
570	Mr Morrison	Brownfield development should be prioritised and incentivised in preference to green belt and green field development.
581	Mr Archibald Clark	Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs. The Scottish Government is the key agency that bears this responsibility yet it appears to be leaving it to local authorities and developers to provide the allegedly needed housing - without having first decided how much good quality agricultural land must be retained to support the nation. There is an obligation on the Scottish Government to make that decision first before deciding the extent to which any built-up area can expand.
592	Cadzow Estate	SESPlan can comply with planning policy and adopting a realistic assessment of need and demand with which to inform the policies adopted to guide the supply of that demand. Adopt a flexible position towards land supply.
593	I&H Brown Limited	The further allocation of sites would have the potential to undermine some of the existing allocations which are crucial for the delivery of the associated infrastructure and strategic goals. In this context it is essential that forthcoming LDP's do not undermine the strategic allocations with early allocations of new sites outweigh the strategic land allocations SLA's.
<b>Question 7 - Are there any further comments on the draft Supplementary Guidance you would like us to consider?</b>		
8	Sports Scotland	Sports Scotland have a toolkit to help in plan making
10	Dr Gray	Flaw with HNDA use of trends and assumptions. The projected figures are not supported by past trends. Will lead to development of greenfield sites; Chosen strategy will lead to ribbon development from Midlothian through to Edinburgh City Centre.
18	Alfred Stewart Properties	Supplementary Guidance should specifically identify the Dunfermline Western Villages as a strategic location capable of accommodating additional growth
24	Regenco	Supports the ongoing identification of Winchburgh as a strategic development location
25	Liberton CC	SG should show breakdown of 2024-2032 housing need by member authority. Online questionnaire is too limited.
48	SNH	Support the design led approach.
49	Mr Mike Martin	Green Belt should be protected for the benefits it provides. Balerno is the least accessible part of Edinburgh. Transport infrastructure is already at capacity in Balerno and therefore further development cannot be accommodated. SG should meet government planning aims.

Response ID	Respondee	Summary
56	Dr Tom Slater	There is no evidence that building lots of housing will contribute to sustainable economic growth - in fact, quite the opposite. The SESplan reflects the imbalance of decision-making power in the post-2006 Scottish local planning system in which the odds are stacked heavily in favour of developers and against the wishes of local communities.
62	Mr Scott Mackenzie	No further comment
64	Mrs Pauline McKenzie	Balerno is not a sustainable location for development due to transport capacity, congestion and green belt issues.
71	Gladman	In order to meet need, permission should be granted for sites in advance of LDP preparation. Historic under delivery should be brought forward and future under delivery should be factored into later in the plan period.
79	SEPA	Willingness to work with SESplan on flood risk and other issues.
81	Scottish Water	No comment
89	Musselburgh Conservation Society	No further comment.
90	Mr Alan Coupe	Fundamental principle of the Green Belt should be defended. Balerno is the least accessible part of Edinburgh. Transport infrastructure is already at capacity in Balerno and therefore further development cannot be accommodated. SG should meet government planning aims.
91	Mrs Beryl Moncrieff	There green belt must be protected. There are sufficient brownfield sites in Edinburgh that should be developed. Transport infrastructure in Balerno cannot accommodate further development.
96	Mr James Loftus	Green Belt should be preserved and not developed for commercial gain. Brownfield sites should be developed. Developing Green Belt will result in irreversible damage to the environment , biodiversity, wildlife and the loss of productive farm land. Balerno's traffic infrastructure cannot accommodate development as it is already congested.
101	Clr Dave Dempsey	No comment
109	Upper Tweed Community Council	Rural development should be supported by public transport improvements and broadband access. Affordable Housing requirements should be lowered to enable development.
110	Mr D Allan	Green Belt must not be encroached on. Currie and Balerno are already traffic congested and links cannot be significantly improved to accommodate development.
111	Coal Authority	No specific comment
118	Murieston Community Council	SG should show split between existing LDPs and new housing demand. The main demand outwith City of Edinburgh is for affordable housing to meet the needs of the local communities. Exporting out the housing allocations from City of Edinburgh to these other SDAs leads to the eventual housing build being skewed towards providing large, expensive houses mainly purchased by families moving out of Edinburgh and does not serve the actual real needs of the local communities.
127	Miss Carolyn Campbell	Questions the need for and distribution of houses across Edinburgh
136	Banks Group	Need for call for sites encouragement as part of LDP process.
137	Mr Alexander Valentine	Green Belt should not be risked, especially when there are so many brownfield sites awaiting development. A need for housing should first be met by looking at abandoned properties and sites and also brownfield sites. Communities need to have a greater say in such developments rather than just profit driven developers. There are many reasons for preserving green belt land which include the following: environmental and conservation purposes, valuable agricultural land, unique landscapes and amenity benefits, preventing loss of community identity. Balerno is the least accessible part of Edinburgh. Transport infrastructure is already at capacity in Balerno and therefore further development cannot be accommodated. SG should meet government planning and SESplan SDP aims.
143	Mr Alan Harrison	Develop derelict land.
144	Dr Simon Jackson	SESplan should not use green field sites until ALL brownfield sites have been exhausted

Response ID	Respondee	Summary
150	Mr James Hardie	Land at Cammo should not be developed as there is no capacity in the transport network and in education capacity. The amenity, landscape, setting and environment of the Cammo estate would be negatively effected.
152	Mr Finlay Lockie	SEA is a blunt tool for allocating development. Large scale development East of Musselburgh (and specifically Goshen Farm) is not suitable because: 1. there are few new employment opportunities in the Musselburgh area which will lead to commuting; 2. little capacity on the Edinburgh North Berwick line; 3. travel from new development will therefore be principally car borne; and 4. existing congestion will be exacerbated. The infrastructure in this area is also not suitable. Namely because: there is not sufficient water infrastructure to delivery both Goose Bay and Goshen Farm; Goshen farm is affected by flooding and contains numerous former mine workings which could lead to problems; and this part of East Lothian is badly affected by air pollution which will be made worse by more car borne development. Other issues affecting the development of the site include: loss of green belt; loss of community identify; coalescence of surrounding settlements; loss of arable land; affecting Battle of Pinkie historic battlefield site; and affecting the setting of a listed building. Other sites should be examined and this should include a review of all 'undeliverable sites' to identify why that is. Other more suitable areas include the site east of Goshen farm, sites further east adjacent to the A1 and west of Musselburgh.
153	Mr T Mann	The park land of Hill Side school between Easter and Wester Aberdour and the grassland beside the harbour are vital elements in the unique character of the village.
164	McTaggart & Mickel Homes	City of Edinburgh Council has failed to plan for its expanding population and has required surrounding Local Authority areas to accommodate its housing land supply. City of Edinburgh Council must now make, admittedly, difficult decisions, to provide the supply of housing required to provide a range and choice of housing opportunities. Not providing an appropriate level of housing development encourages commuting and unsustainable development caused by leapfrogging of the Green Belt. Supply needs to be met where the housing demand is greatest. There is no evidence within the guidance or the technical note of an assessment capacities and infrastructure or whether a more appropriate planning solution would be for a greater amount of housing supply being provided in the area where the demand arises i.e. within the City of Edinburgh. There is no acknowledgement that housing plays an important role in a growing economy. Increasing density does not deliver attractive and sustainable developments. A large development should be allocated at the Gilmerton Station Road in the Edinburgh LDP. There is a lack of analysis in the Technical Note of the South East Edinburgh SDA. The level of housing expected to come forward from constrained sites is over estimated.
169	Mr Andrew Naylor	It essential to preserve and reinforce the existing boundaries of Green Belt land. It prevents sprawl, encourage biodiversity and offers leisure and recreation opportunities. Balerno cannot accommodate further development due to infrastructure capacity issues, including transport. Brownfield sites in Edinburgh should be developed instead.
176	Scottish Government	No further comment.
203	Mr Peter Scott	Developing the Garden District with housing and infrastructure would reduce the need for further housing in West Edinburgh. This would reduce pressure on transport infrastructure in this area.
214	Airthrie Estates	Winchburgh can accommodate further development. This area is supported by transport connections and available infrastructure capacity.
221	Strawson Property	No further comment.
222	Mr Pam Mackay	Scottish Government incentives / requirements for the development of existing brownfield sites would develop city centre sites, improve these areas, and protect the Greenbelt boundaries which contribute to the environmental qualities of the City. The Cammo fields are home to a great deal of wildlife, much of it endangered

Response ID	Respondee	Summary
223	Grange and Prestonfield Community Council	The consequences if the implied rate of housing completion is not achieved could be scattered piecemeal housing development and infrastructure provision in the wrong place with a consequential waste of financial and other resources. Consider lower rates of housing growth try to minimise these risks and ensure that as far as possible actual new housing and infrastructure provision are properly integrated over a range of possible economic scenarios. We therefore are concerned that the existing LDP safeguards and provisions about the green belt and open spaces may be inadequate to withstand the onslaught implied by the SG itself. We think that development should be LDP led and not Appeal led and we fear that local concerns are being swamped by a top-down policy which may prove to be unrealistic.
239	Cockburn Association	No further comments
241	Mrs Linda Allison	Green Belt should be protected for the benefits it provides. Balerno is the least accessible part of Edinburgh. Transport infrastructure is already at capacity in Balerno and therefore further development cannot be accommodated. SG should meet government planning aims.
248	Kalewater Community Council	There is a need to match new housing with jobs in rural areas.
249	Mr Ian Sandison	Land south of Cockburn Crescent, Balerno should not be developed as this would contradict with the aims of the plan. This is because; agricultural land will be lost; Cockburn Crescent is the clear boundary between Balerno and the Regional Park. Breaching this boundary would create a dangerous precedent; development will exacerbate existing infrastructure deficits; Balerno is the least accessible area in Edinburgh to employment; and existing traffic congestion will worsen.
258	Haddington and District Amenity Society	No further comments
282	Mr Martin Bailey	1. Democratic Deficit. Pre Christmas consultation period was not appropriate. 2. The language of the documents is impenetrable. 3. No clear explanation of the methodologies used, especially relating to previous exercises. 4 There seems scant attention paid to the environmental impacts of the various proposals. 5. No attention paid to the preservation or enhancement of the many beautiful and historic towns, villages, stretches of countryside, that seem to be threatened by over-development. 6. The balance between public and private finance of new housing is not clear. 7. What extent is requirement of 155k houses a catching-up exercise to cope with perceived inadequacies of supply? 8. The implications of independence are not discussed.
289	Yeoman McAllister Architects	Should consider sites where housebuilders are keen to develop, such as Ratho.
298	Mr Jon Grounsell	This plan is completely unsustainable as it knowingly increases traffic impacts and infrastructure costs. Demand is down and we need less land supply, not more, quite the opposite of what is proposed here.
300	Balerno Community Council	If Government truly 'value and enjoy our built and natural environment' then it will reject the housing requirement as unnecessary and unrealistic. If government truly also believe that we must 'reduce the local and global environmental impact of our consumption and production', then it will recognize that destruction of the diminishing pool of prime agricultural land is the antithesis of sustainability. If Government truly believes that 'we should live in well designed sustainable places' it would recognize that requiring housing development without access to good infrastructure and transport risks traffic congestion, increased pollution and longer journey to work times. In general terms this housing requirement would lead in the opposite direction to the claimed goal. In summary the Housing requirement will achieve precisely the opposite effect to that which Government apparently wishes to achieve.
313	EDI Brunstane	Brunstane can play a strategic part in providing the additional allowance proposed by the draft SG in the South East Edinburgh SDA (2,500 units), as part of a comprehensive green belt release. In accordance with SPP, we consider it is entirely appropriate for the SDPA to establish the need for a green belt and identify its broad area, which will support a sustainable distribution of growth. Further, Brunstane could play a role in satisfying increased additional allowances which we consider should be brought forward in the South East Edinburgh SDA as an established priority location, this being a more sustainable strategy than locating 4,530 units outwith SDAs. The assumed land supply of 83,207 units is questioned.

Response ID	Respondee	Summary
320	Mr Douglas Allison	Green Belt should be protected for the benefits it provides. Balerno is the least accessible part of Edinburgh. Transport infrastructure is already at capacity in Balerno and therefore further development cannot be accommodated. SG should aim to meet government planning aims.
321	Mr Dario Bianco	Principles of Green Belt must be defended. Balerno has insufficient transport infrastructure and is the least accessible part of Edinburgh. New developments must be allowed but only in a balanced, sustainable and community enhancing manner. Short term commercial development interests must not be permitted to hijack these long term sustainability policies.
322	Mr Clive Hembury	Prime agricultural land should be defended for the long term benefits it brings. Brownfield sites should be developed. Transport infrastructure in Balerno cannot accommodate further development. Building on green belt land will only result in the steady unsustainable decline in our green (and vital) spaces.
323	Portobello Community Council	Concerned that identifying all the additional greenfield/Greenbelt sites to meet housing requirements could undermine Brownfield regeneration.
324	Dr Quitin Bradshaw	Green Belt protects the countryside from urban sprawl. Development should be accommodated with the city limits which have high public transport accessibility. Brownfield sites should be developed first. Balerno's roads are congested and the transport network cannot accommodate new development. Developing out of town green belt sites will not meet government aims.
330	Mrs Ruth Schofield	By allocating greenbelt land to build on we will: 1 Negatively impact our future environment; 2 Negatively affect our transport and infrastructure; 3 Negatively affect the availability of prime agricultural land; and 4 Negatively impact our integrity as decision would go against underlying principles of the Council Planning.
331	Miss Kirsten Bradshaw	Green Belts must be protected. The Lanark Road is at capacity and further traffic may affect safety. Whilst there is a need for more housing, there is also the need to protect Green Belts. Brownfield sites should be developed.
332	Mr Rory Bradshaw	Green Belt round cities should be protected. Balerno is the least accessible location in Edinburgh and it's transport infrastructure could not accommodate further development. Accessible brownfield sites should be developed instead.
333	Dr Fiona Bradshaw	Green Belt should be protected from development. It instead should be directed to accessible brownfield sites. Balerno is not accessible to jobs the transport and education infrastructure are at capacity. Government aims should be to protect the environment whilst supporting communities and improving our nation. Destroying the green belt would only support the developers .
334	Mr Frank Phillips	The real need is for sustainable housing in areas where the environmental impact can be minimised having due regard for employment opportunities, low carbon travel and easy access to shops, health services, schools etc. The Green Belt around Balerno should not be developed as this would result in the loss of a desirable resource.
335	Mrs Mary Taylor	Opposed to development in Aberdour. It would lead to a loss of identity and impact on the character of the village. The road network is insufficient to accommodate further development.
336	McEwan	Green Belt around the Pentlands should be protected. Development in Balerno would lead to more sustainable out-commuting. Junctions on the Lanark Road are congested.
337	Ms Adele Shields	The Green Belt around Balerno should be protected. Balerno is the least accessible area to employment in Edinburgh. The Lanark Road is congested and transport infrastructure could not sustainably accommodate further development.
343	Mr Ewing Grainger	Green Belt should be protected for the benefits it provides. Balerno is the least accessible part of Edinburgh. Transport infrastructure is already at capacity in Balerno and therefore further development cannot be accommodated. SG should aim to meet government planning aims.
347	Mrs Gertrud Mallon	The Fife Outside SDAs allowance should be lowered. Coastal Villages should be protected. The Consultation Portal is not user friendly.
348	Lynn Mann	The Pentlands Green Belt must be protected for agriculture and amenity. There are sufficient brownfield sites within Edinburgh. Housing needs should be met in more sustainable locations.



Response ID	Respondee	Summary
349	Mrs Andrew Veitch	Land south of Cockburn Crescent, Balerno should not be developed. The character of the village would be affected. It would contradict aims of the plan. The one road out of Balerno is congested and cannot accommodate further development. Additionally, the local services e.g. health, education can in no way accommodate such prospective additional numbers. The sewage system would need to be complete upgraded. Green Belt should be protected and brownfield sites developed instead.
354	Mrs Anna Purdie	Fife (outwith the strategic development area) should have the proposed allocation of houses lowered. The cultural heritage and the coastal villages need to be preserved and the negative impact it will have on the area will be huge. The website is difficult to uses
355	Professor John Ensor	Green Belt should be protected for landscape, agriculture and community benefits. Balerno is not accessible to employment and development will lead to unsustainable travel. Development should be in accessible locations. Transport infrastructure in Balerno could not accommodate further development. Planning should be community focussed.
356	Professor John Ensor	Duplicate of 355
357	Ms Geraldine Jones	Green Belt should be protected as it prevents urban sprawl. Balerno is not a suitable place for development as it would lead to long commuting and would affect the character and amenity of the village. Development should be in sustainable locations.
358	Ms Geraldine Jones	Duplicate of 357
361	Mr Alan Pithie	Cammo residents are against the proposed development in the area. Democratic opinion should be respected.
376	Mrs Karon Gilhooley	There is sufficient brownfield land available for development in Edinburgh. Green Belt land should be protected for the environmental, agricultural and community benefits it brings.
382	Mrs Elaine Hutchison	One of the Government's 5 Strategic Objectives is to make a "Greener Scotland". Don't compromise this by allocating land for housing to meet a target that will mean that the Government's Strategic Objectives will fail: We value and enjoy our built and natural environment - bad decisions made now to meet a housing deadline could compromise our natural environment by building on greenbelt and prime agricultural land. Reduce the local and global environmental impact of our consumption and production - by building on agricultural land we are not moving towards our sustainability targets, become more self-sufficient and reducing food miles. We live in well designed sustainable places - by building in areas without access to good road infrastructure or public transport links, we are increasing the reliance on cars, increasing traffic congestion and increasing carbon dioxide emissions. By not considering the sustainability component (enhance the environment and reduce emissions) the Government will fail in its purpose to increase <u>sustainable economic growth</u> .
390	Mrs Genevieve MacKinlay	Green Belt must be protected for the benefits it brings. Transport infrastructure in Balerno is congested. Brownfield areas accessible to employment should be developed instead.
391	Mr Gordon MacKinlay	The Pentland Green Belt should be protected from development. Development should be located in locations accessible to employment. Wildlife would be significantly affected by Green Belt development.
394	Mr Christopher Bradshaw	The Green Belt in Balerno, and the benefits it brings, should be protected. Development in Balerno would contradict the sustainable aims of SESplan. Balerno's transport infrastructure is congested and could not accommodate further development.
400	Ms Maureen McCulloch	Housing should be in sustainable locations, close to or with good (especially public) transport links to employment/facilities. Easy to development car borne suburban developments is out of step with climate change and carbon reduction targets. Green Belt should be protected in South West Edinburgh and not replaced by 'stepford' type housing developments. The Lanark Road is already congested.
401	Mrs Caitlin Hamlitt	No further comments

Response ID	Respondee	Summary
412	Burnside	Development on the Green Belt must not be permitted and housing must be met where the need is. The type of housing required must be built, including affordable housing, not just the type of housing which will give maximum profit for the developer, it must be needs led and not developer led. Development must be supported by infrastructure.
419	Juniper Green Community Council	The policy SESplan are now required to implement will lead to unwelcome, unsustainable change. Measures need to be put in place to ensure developers use all brownfield sites to minimise the need for green field development. There is a complete lack of transparency in the current system for determining effective land supply, which means that developers seem to have a veto in being able to declare some brownfield sites as ineffective. Need a clearer statement from the Scottish Government that it remains committed to a policy of <u>protecting the long established green belts around Edinburgh and other settlements.</u>
436	Mr James Poseley	More opportunities should be given for communities to influence plan making.
437	Mrs Susan Warwick	Land at Cammo should not be developed because of 1. impact on congested transport network, 2. impact of ecology and animal species and 3 loss of arable land when promoting sustainability.
441	Mr Blair Melville	SESplan is a strategic plan characterised by a lack of strategic vision. It is a Plan wedded to outdated ideas about: 1 "constraints" as the driver of locations for development, not potential; 2 sacrosanct Green Belt with no thinking about form, purpose or competing planning objectives; 3 Seeking to force the market to operate in ways which it cannot achieve; 4 Brownfield being inherently better/more sustainable than green field/edge of settlement; and 5 Dispersing housing demand in ways which worsen sustainability especially around travel patterns. It has no sense of seeking to achieve outcomes which are in the national interest, despite it being one of a suite of strategies the remainder of which clearly seek economic growth, prosperity, equality of opportunity, higher standards and so on.
446	Cramond & Barnton Community Council	The Murray Estate's Edinburgh Garden District proposal could offer the critical mass sufficient to provide the major infrastructure improvements which would be required. This would reduce the impact on West Edinburgh and its infrastructure.
447	HPG Dalkeith	South East Edinburgh is being artificially restrained. It is not clear from spatial strategy refresh how the allowances for SE Edinburgh were derived. There is an ongoing reliance on non delivering existing commitments. More housing land is required to support Shawfair, which Cauldcoats Farm can provide. Midlothian's Housing Land Audit 2012 does not demonstrate a 5 year effective land supply. Green Belt and landscape arguments are outweighed by the strategic nature if the site and the need to meet housing needs at source. Coalescence has been mentioned without any references to place making. Prior to finalising the SG there is a need to: 1 properly allocate additional housing requirements across SDAs with a weighting in favour of distributing sites in accordance with demand and need; 2 Fully test effectiveness and programming against the overall strategy and housing targets (including affordable housing); 3 Cost and phase the requirements for education and transportation provision as part of a realistic Action Plan; 4 Ensure that planning obligations are realistic and viable using triggers, interim payments and phasing; and 5 Properly balance the economic benefits and environmental impact of proposed allocations within the SDA

Response ID	Respondee	Summary
448	HPG Dalkeith	It is the intention of HPG Dalkeith to pursue the plan led approach and potentially press forward with a planning application in due course. In the interim we would urge SESplan and Scottish ministers to review the SPG recommendation for South East Edinburgh in the light of overall SDP targets and the proposed allocations elsewhere which are far less sustainable. provision is required for the 'full range of stakeholders' to be involved in the preparation of the guidance including the development industry and the public. It is not clear how this has been implemented within the Midlothian area given the procedural relationship that currently exists between the respective SDP and LDP processes. In reality a new call for sites and detailed SEA should have been part of the SPG review. Conclusion demonstrates that Cauldcoats meets the planning objectives for sustainable development, as well as seamlessly integrating with the spatial strategy and settlement pattern being pursued by the Strategic Development Plan (SDP). Cauldcoats clearly has the potential capacity to accommodate development and a strong case is made to propose an amendment to the preferred strategy to fully take key policy and material factors into consideration.
453	Mr Philip Leng	The reasons for green belt policy have not changed and are now more relevant than ever. Housing development should be focussed in sustainable areas as has been suggested by the governments green policies and not dictated to by housing developers pressure to develop cheaper, easier green belt land. Transport infrastructure in Balerno is congested and cannot accommodate further development.
462	Firrhill Community Council	Understand the need for affordable housing but not convinced that greenfield development on the edge of the City will deliver this. It is time local authorities took control of the housing needs in their area and invested in new developments to meet those needs and where necessary through the compulsory purchase of land for such developments
476	Miller Homes East Scotland	Fife Council should adopt the East Lothian Council approach to 5 year land supply given the time taken to adopt plans.
478	Mrs Blyth Peart	Important to recognise the loss of agricultural land.
480	Dr Simon Nicholson	Green Belt round Balerno should be protected for the benefits it brings. Transport infrastructure in Balerno is congested and cannot accommodate further development.
487	Mr Lauchie Scougall	Green Belt should be protected for the benefits it provides. Transport infrastructure in Balerno is congested and cannot accommodate further development. Balerno has poor access to employment which will lead to out commuting and an increase in vehicle emissions. Developing in Balerno would be contrary to the aims of SESplan of locating development in accessible locations that can be sustainable developed.
493	Dr Caroline Ritchie	Concerned that housebuilding requirement will compromise sustainability and other Scottish Government objectives. Too many short term decisions are being made against long term objectives.
501	Persimmon Homes East Scotland	As 441. More information justifying the strategy in the technical note should be brought into the SG itself.
505	Aberdour Community Council	Housing requirements should not be dictated. Further consultation required.
512	Stewart Milne Homes	AS 441. SESplan is a strategic plan characterised by a lack of strategic vision. It is a Plan wedded to outdated ideas about: 1 "constraints" as the driver of locations for development, not potential; 2 sacrosanct Green Belt with no thinking about form, purpose or competing planning objectives; 3 Seeking to force the market to operate in ways which it cannot achieve; 4 Brownfield being inherently better/more sustainable than green field/edge of settlement; and 5 Dispersing housing demand in ways which worsen sustainability especially around travel patterns. It has no sense of seeking to achieve outcomes which are in the national interest, despite it being one of a suite of strategies the remainder of which clearly seek economic growth, prosperity, equality of opportunity, higher standards and so on. SESplan 2 should set out a 30-50 year vision.
522	Aberdour Community Council	Duplicate of 505. Housing requirements should not be dictated. Further consultation required.

Response ID	Respondee	Summary
526	Wallace Land Investment & Management	This Supplementary Guidance continues to be non-compliant with SPP but with no benefits to delivering sustainable economic growth. If this Supplementary Guidance is approved unchanged, then it will only lead to further delays, creating even more problems for the delivery of much needed housing land in the subsequent LDP process. It has the potential to stifle much needed investment and growth in a region that is the economic driver for Scotland. This is contrary to NPF and SPP.
539	Hallam Land Management	This Supplementary Guidance continues to be non-compliant with SPP but with no benefits to delivering sustainable economic growth. If this Supplementary Guidance is approved unchanged, then it will only lead to further delays, creating even more problems for the delivery of much needed housing land in the subsequent LDP process. It has the potential to stifle much needed investment and growth in a region that is the economic driver for Scotland. This is contrary to NPF and SPP.
546	Farningham Planning Ltd	There is an error in tables 8.17 and 8.19. Given the text in the document South West and North West Edinburgh should be identified as capable of accepting strategic development.
563	Mr Nick Lansdell	Focus on developing existing sites, rather than spreading effort and investment across new sites and lessening likelihood of plan success. Delivery of existing sites in West Lothian within the plan period is unlikely
564	Scottish Property Federation	There is little analysis of 'non-traditional' housing tenure within the Supplementary Guidance and yet Edinburgh is arguably one of the most attractive locations for build to rent activity in the UK. CEC should be encouraged to act upon this positive attraction. Building for market rental properties may actually deliver quicker returns in terms of housing supply than the traditional home buying sector. If a major increase in supply of this tenure can be achieved then this may act to relieve pressure upon other parts of the region to deliver more traditional forms of housing quickly. That there is a potential clash between where the Supplementary Guidance and planning authorities are seeking investment and where the private sector believes housing investment can be delivered. This could lead to inertia which will benefit neither the development industry nor the delivery of local and central government policy. We believe there must be some scope for controlled development of urban centres, in particular where they coincide with appropriate infrastructure developments. This could be done with a view to reinvesting appropriately defined revenues to the support of brownfield sites retained within the existing development plan.
571	Mr Morrison	A thorough analysis of the ecological and traffic situation at Cammo is required.
582	Anonymous	Duplicate of 584. It is disturbing to note that Reporters appear to be more concerned about local authorities meeting their housing needs by reference to SESplan than ensuring that the democratically approved Local Plan is applied. Planning approval by Appeal is not a suitable process and will lead to unsustainable development and landbanking.
584	Mr Archibald Clark	It is disturbing to note that Reporters appear to be more concerned about local authorities meeting their housing needs by reference to SESplan than ensuring that the democratically approved Local Plan is applied. Planning approval by Appeal is not a suitable process and will lead to unsustainable development and land banking.
585	Susan Kirby	Green Belt around Balerno should not be developed because: it is not accessible to employment and has limited public transport access; would lead to a loss of productive farmland; and the Green Belt is to stop urban sprawl.
586	Cadzow Estate	concerned that the Supplementary Guidance has failed to make adequate provision for housing land in the SESplan. Concerned that it has not sufficiently considered housing in the West Edinburgh/East West Lothian interface. Land at Kilpunt Farm is flexible, unconstrained, available immediately and capable of delivering large supply of housing.
594	I&H Brown Limited	Support for Fife Council's continued position on Dunfermline's expansion to the West, North and North West.
596	North Berwick Community Council	North Berwick is already accommodating an amount of new development. The existing infrastructure cannot cope with a huge influx of new houses and that the life style currently enjoyed by residents will be ruined. If new development is to occur it should be for smaller, affordable homes for local people. We would urge that new homes should be built as closely as possible to employment opportunities and transport links.

Response ID	Respondee	Summary
597	Helen McCallum	If development is permitted in Aberdour it will destroy the seaside character of the village and the attractiveness of the beach. Development should be located towards Kinross instead.
598	Barratt and David Wilson Homes	Over reliance on distributing Edinburgh's need to Midlothian and Scottish Borders. Reconsideration is required to accommodate a higher proportion of Edinburgh's demand within the north-west, south-west, south-east and west of the city. Additional allowances in Fife appear over-optimistic and should be re-directed toward Edinburgh. Interim guidance on land supply, like East Lothian is required to be adopted by other authorities.
599	Jenny Parsons	Same as 152. SEA is a blunt tool for allocating development. Large scale development East of Musselburgh (and specifically Goshen Farm) is not suitable because: 1. there are few new employment opportunities in the Musselburgh area which will lead to commuting; 2. little capacity on the Edinburgh North Berwick line; 3. travel from new development will therefore be principally car borne; and 4. existing congestion will be exacerbated. The infrastructure in this area is also not suitable. Namely because: there is not sufficient water infrastructure to delivery both Goose Bay and Goshen Farm; Goshen farm is affected by flooding and contains numerous former mine workings which could lead to problems; and this part of East Lothian is badly affected by air pollution which will be made worse by more car borne development. Other issues affecting the development of the site include: loss of green belt; loss of community identify; coalescence of surrounding settlements; loss of arable land; affecting Battle of Pinkie historic battlefield site; and affecting the setting of a listed building. Other sites should be examined and this should include a review of all 'undeliverable sites' to identify why that is. Other more suitable areas include the site east of Goshen farm, sites further east adjacent to the A1 and west of Musselburgh.
600	Jimmy Anderson	Same as 152. SEA is a blunt tool for allocating development. Large scale development East of Musselburgh (and specifically Goshen Farm) is not suitable because: 1. there are few new employment opportunities in the Musselburgh area which will lead to commuting; 2. little capacity on the Edinburgh North Berwick line; 3. travel from new development will therefore be principally car borne; and 4. existing congestion will be exacerbated. The infrastructure in this area is also not suitable. Namely because: there is not sufficient water infrastructure to delivery both Goose Bay and Goshen Farm; Goshen farm is affected by flooding and contains numerous former mine workings which could lead to problems; and this part of East Lothian is badly affected by air pollution which will be made worse by more car borne development. Other issues affecting the development of the site include: loss of green belt; loss of community identify; coalescence of surrounding settlements; loss of arable land; affecting Battle of Pinkie historic battlefield site; and affecting the setting of a listed building. Other sites should be examined and this should include a review of all 'undeliverable sites' to identify why that is. Other more suitable areas include the site east of Goshen farm, sites further east adjacent to the A1 and west of Musselburgh.

Response ID	Respondee	Summary
601	Mr Jonathan Gillies	<p>We wish to register our opposition to the additional development of land in the East Lothian West (particularly Goshen Farm) area on the grounds that: 1 it is likely to result in loss or use of a significant area of Green Belt land; 2 it would destroy the cultural value of an important part of the historically significant site of the Battle of Pinkie, recently designated; 3 it is part of the setting of Drummohr House; 4 The current application affecting Goshen Farm would be use of prime agricultural land; 5 development of any further land in East Lothian West advances the coalescence of Musselburgh and Prestonpans; 6 there is little or no prospect of any increase in commuter rail capacity, so the Edinburgh-bound transport load will fall on Musselburgh High Street and Salter's Road. Both these routes are already at full capacity for much of the day. Musselburgh High Street air quality is below national standards. Any increased load on these routes would be intolerable; 7 Development of any further sites in the East Lothian West vicinity, in addition to Goose Bay, would produce excessive urbanisation around Wallyford with a lack of satisfactory integration with existing communities; 8 Existing mains water supply capacity is only adequate for the Goose Bay development; and 9 There requires to be a major improvement in capacity of infrastructure - for instance Secondary schooling - before such significant additional housing is contemplated. New housing allocations should be made either to the west of Musselburgh (e.g., land adjacent to QMU campus), or sufficiently to the East, and with access to the A1(e.g., Blindwells, Cockenzie Power Station), so that Edinburgh-bound traffic will take this route.</p>
602	Jan Samuel	<p>As 601. We wish to register our opposition to the additional development of land in the East Lothian West (particularly Goshen Farm) area on the grounds that: 1 it is likely to result in loss or use of a significant area of Green Belt land; 2 it would destroy the cultural value of an important part of the historically significant site of the Battle of Pinkie, recently designated; 3 it is part of the setting of Drummohr House; 4 The current application affecting Goshen Farm would be use of prime agricultural land; 5 development of any further land in East Lothian West advances the coalescence of Musselburgh and Prestonpans; 6 there is little or no prospect of any increase in commuter rail capacity, so the Edinburgh-bound transport load will fall on Musselburgh High Street and Salter's Road. Both these routes are already at full capacity for much of the day. Musselburgh High Street air quality is below national standards. Any increased load on these routes would be intolerable; 7 Development of any further sites in the East Lothian West vicinity, in addition to Goose Bay, would produce excessive urbanisation around Wallyford with a lack of satisfactory integration with existing communities; 8 Existing mains water supply capacity is only adequate for the Goose Bay development; and 9 There requires to be a major improvement in capacity of infrastructure - for instance Secondary schooling - before such significant additional housing is contemplated. New housing allocations should be made either to the west of Musselburgh (e.g., land adjacent to QMU campus), or sufficiently to the East, and with access to the A1(e.g., Blindwells, Cockenzie Power Station), so that Edinburgh-bound traffic will take this route.</p>
603	Mr Alan Watson	<p>Same as 152. SEA is a blunt tool for allocating development. Large scale development East of Musselburgh (and specifically Goshen Farm) is not suitable because: 1. there are few new employment opportunities in the Musselburgh area which will lead to commuting; 2. little capacity on the Edinburgh North Berwick line; 3. travel from new development will therefore be principally car borne; and 4. existing congestion will be exacerbated. The infrastructure in this area is also not suitable. Namely because: there is not sufficient water infrastructure to delivery both Goose Bay and Goshen Farm; Goshen farm is affected by flooding and contains numerous former mine workings which could lead to problems; and this part of East Lothian is badly affected by air pollution which will be made worse by more car borne development. Other issues affecting the development of the site include: loss of green belt; loss of community identify; coalescence of surrounding settlements; loss of arable land; affecting Battle of Pinkie historic battlefield site; and affecting the setting of a listed building. Other sites should be examined and this should include a review of all 'undeliverable sites' to identify why that is. Other more suitable areas include the site east of Goshen farm, sites further east adjacent to the A1 and west of Musselburgh.</p>

Response ID	Respondee	Summary
604	Mr Keith Forrest	<p>Same as 152. SEA is a blunt tool for allocating development. Large scale development East of Musselburgh (and specifically Goshen Farm) is not suitable because: 1. there are few new employment opportunities in the Musselburgh area which will lead to commuting; 2. little capacity on the Edinburgh North Berwick line; 3. travel from new development will therefore be principally car borne; and 4. existing congestion will be exacerbated. The infrastructure in this area is also not suitable. Namely because: there is not sufficient water infrastructure to delivery both Goose Bay and Goshen Farm; Goshen farm is affected by flooding and contains numerous former mine workings which could lead to problems; and this part of East Lothian is badly affected by air pollution which will be made worse by more car borne development. Other issues affecting the development of the site include: loss of green belt; loss of community identify; coalescence of surrounding settlements; loss of arable land; affecting Battle of Pinkie historic battlefield site; and affecting the setting of a listed building. Other sites should be examined and this should include a review of all 'undeliverable sites' to identify why that is. Other more suitable areas include the site east of Goshen farm, sites further east adjacent to the A1 and west of Musselburgh.</p>
605	Mr Malcolm Durney	<p>As 601. We wish to register our opposition to the additional development of land in the East Lothian West (particularly Goshen Farm) area on the grounds that:1 it is likely to result in loss of Green Belt land; 2 it would destroy the cultural value of an important part of the historically significant site of the Battle of Pinkie; 3 it is part of the setting of Drummohr House; 4 The current application affecting Goshen Farm would be use of prime agricultural land; 5 development of any further land in East Lothian West advances the coalescence of Musselburgh and Prestonpans; 6 there is little or no prospect of any increase in commuter rail capacity, so the Edinburgh-bound transport load will fall on Musselburgh High Street and Salter's Road. Both these routes are already at full capacity for much of the day. Musselburgh High Street air quality is below national standards. Any increased load on these routes would be intolerable; 7 Development of any further sites in the East Lothian West vicinity, in addition to Goose Bay, would produce excessive urbanisation around Wallyford with a lack of satisfactory integration with existing communities; 8 Existing mains water supply capacity is only adequate for the Goose Bay development; and 9 There requires to be a major improvement in capacity of infrastructure - for instance Secondary schooling - before such significant additional housing is contemplated. New housing allocations should be made either to the west of Musselburgh (e.g., land adjacent to QMU campus), or sufficiently to the East, and with access to the A1(e.g., Blindwells, Cockenzie Power Station), so that Edinburgh-bound traffic will take this route.</p>
606	Mrs Arlene Reid	<p>As 601. We wish to register our opposition to the additional development of land in the East Lothian West (particularly Goshen Farm) area on the grounds that:1 it is likely to result in loss of Green Belt land; 2 it would destroy the cultural value of an important part of the historically significant site of the Battle of Pinkie; 3 it is part of the setting of Drummohr House; 4 The current application affecting Goshen Farm would be use of prime agricultural land; 5 development of any further land in East Lothian West advances the coalescence of Musselburgh and Prestonpans; 6 there is little or no prospect of any increase in commuter rail capacity, so the Edinburgh-bound transport load will fall on Musselburgh High Street and Salter's Road. Both these routes are already at full capacity for much of the day. Musselburgh High Street air quality is below national standards. Any increased load on these routes would be intolerable; 7 Development of any further sites in the East Lothian West vicinity, in addition to Goose Bay, would produce excessive urbanisation around Wallyford with a lack of satisfactory integration with existing communities; 8 Existing mains water supply capacity is only adequate for the Goose Bay development; and 9 There requires to be a major improvement in capacity of infrastructure - for instance Secondary schooling - before such significant additional housing is contemplated. New housing allocations should be made either to the west of Musselburgh (e.g., land adjacent to QMU campus), or sufficiently to the East, and with access to the A1(e.g., Blindwells, Cockenzie Power Station), so that Edinburgh-bound traffic will take this route.</p>

Response ID	Respondee	Summary
607	The Community Council of the Royal Burgh of Peebles and	The increased housing requirements affecting Peebles are excessive.



**APPENDIX B**

Summary of the main issues raised by the Consultation Responses Received and SESplan Responses to the Consultation Responses Recieved on the draft Supplementary Guidance on Housing Land

## Summary of Main Issues (By Alphabetical Order)

The full responses are available to view and download at -

<http://sesplan-consult.objective.co.uk/portal/sg/hsgland>

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
<b>A - Brownfield</b>				
A1	113, 234, 295, 342, 233, 144, 149, 419, 331, 504, 143, 169, 322, 110, 96, 570, 222, 349, 380, 390, 251, 325., 459, 579, 348, 137, 402, 332, 91, 376, 350, 416	Brownfield sites should be maximised first. Priority should be given to brownfield opportunities. There is sufficient brownfield land within Edinburgh to meet the required need and demand.	The approved Strategic Development Plan (SDP) gives priority to brownfield sites. When preparing Local Development Plan (LDPs) Member Authorities should give priorities to brownfield sites if it is shown that can be delivered over the plan period.	Not required in this instance
A2	445, 492, 461, 142, 402, 570, 222, 387, 380, 390, 564	Brownfield sites should be incentivised.	SESplan will raise the issue of incentives with Member Authorities and the Scottish Government.	Not required in this instance
A3	466, 504, 137, 380, 53	Research suggests there are 10,000 empty homes in Edinburgh. These should be brought back into use before releasing greenfield land. Empty homes should be used to meet need.	The level and type of empty homes that can be brought back into use could be considered in meeting the housing requirement in LDP preparation.	Not required in this instance
A4	457, 323	The numbers will undermine the delivery of housing on existing brownfield sites.	The approved SDP indicates that brownfield sites should be prioritised and that new development proposals will complement not undermine the delivery of existing committed development.	Not required in this instance
<b>B - Completions</b>				
B1	13, 19, 14, 20	Table 3.2 of the Technical Note shows completions incorrectly as 4,451, this figure should be 4,437.	The latest information for completions is 4,451. The figure of 4,437 comes from totalling the number of completions as reported and published in the annual Housing Land Audits (2010, 2011 and 2012). However, when discussing Audits with the development industry, errors / omissions from previous Audits are advised. The figures cannot be updated in published documents but are recorded on the Housing Land Audit database.	Not required in this instance
B2	308, 393	The Guidance has been drafted on the basis that a very significant increase in completions will occur. This is questioned.	Completions will need to increase from recent levels. SESplan and Member Authorities will be working with the development industry, key agencies and the Scottish Government to increase housing delivery rates towards delivering a long term strategy.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
<b>C - Constrained</b>				
C1	13,14, 19, 20, 162, 168, 308, 519, 528, 163, 365, 371, 11, 485, 544, 497, 509, 531, 542, 167, 498, 508, 533	The figures are based on unsubstantiated assertions and overstated.	The figures were drawn from the agreed Housing Land Audit (HLA) 2012. The purpose of the Supplementary Guidance is not to demonstrate a 5 year land supply or to allocate individual development sites but to identify a housing land requirement that will enable the delivery of the vision, aims and spatial strategy of the approved SDP.	Not required in this instance
C2	16, 427, 449, 164, 529, 533, 22, 547, 314, 219, 485, 540, 301	Constrained land will not fully deliver over period	Effective supply is to be reviewed during LDP preparation to meet the requirements set out in table 3.1. This is set out in the Approved SDP and paragraph 3.8 of the Supplementary Guidance. All constrained development is not anticipated to be delivered within the plan period.	Not required in this instance
<b>D - Delivery</b>				
D1	212, 69, 499	Planning making delays will prevent delivery	LDPs are progressing following the adoption of the SDP and the forthcoming approval of the Supplementary Guidance.	Not required in this instance
D2	409, 54, 56, 455, 427, 417, 580, 106, 292, 294, 33, 411, 237, 385, 398, 380, 264, 311, 460, 428, 120, 298	Lack of finance/state of economy preventing delivery. The required rates are not realistic prevent short term delivery.	The SDP and LDPs can promote sustainable economic growth which will support delivery of the ambitious plan. Completions will need to increase from recent levels. SESplan and Member Authorities will be working with the development industry, key agencies and the Scottish Government to increase housing delivery rates towards delivering a long term strategy.	Not required in this instance
D3	593, 595, 563, 380	Further allocation of sites could undermine delivery of existing sites	The SDP sets out that "New development proposals will complement and not undermine the delivery of existing committed development".	Not required in this instance
D4	71	Under delivery to be factored later into plan period	Member authorities will base their 5 year land supply calculations on the period 2009-2024.	Not required in this instance
D5	68, 537, 418, 524	LDPs to re-assess land supply in LDP preparation	Paragraph 23 of the approved SDP sets out that the LDPs will re-assess the ability of sites to deliver completions by 2024. Paragraph 3.13 of the Supplementary Guidance required 5 year land supply calculations to be factored into LDP preparation.	Not required in this instance
D6	71, 472	Sites need to be permitted before LDPs prepared	Where they accord with policy, the SDP does not prevent this.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
D7	265, 587, 189, 177, 182, 428, 195, 200, 87, 270, 552, 183, 188, 194	Existing strategic sites are not delivering	The SDP sets out to deliver a long term vision which should not be discarded for unsustainable short term gains. The approved SDP states that the spatial strategy builds on existing committed development. New development proposals will complement and not undermine the delivery of existing committed development.	Not required in this instance
D8	434, 181, 182, 469, 199, 200, 535, 495, 500, 486, 545, 187, 188, 301, 194, 303	Need generous supply of effective sites in marketable areas	The strategy set out in the SDP of focussing new development in the identified SDAs, was approved by Scottish Ministers. These areas are considered marketable and align with areas of housing need and build on future opportunities.	Not required in this instance
D9	385	Sufficient existing sites.	Constraints on some of these sites will prevent delivery within the plan period. This issue is assessed annually by member authorities.	Not required in this instance
D10	598, 265, 476	Need for East Lothian Five Year Land Supply approach.	This is an LDP matter. Approved SDP policy 7 sets out the position on 5 Year Land Supply.	Not required in this instance
D11	474	Identify smaller sites without infrastructure requirements.	This is an LDP matter.	Not required in this instance
D12	107, 121	Existing sites should be incentivised.	The SDP sets out that "New development proposals will complement and not undermine the delivery of existing committed development".	Raise the issue of incentives with the appropriate bodies.
D13	492, 88	Increasing funding for social housing.	This is not a matter that the Supplementary Guidance can address. The comments will be forwarded to the Scottish Government and the Member Authorities.	Not required in this instance
D14	557	Push public transport initiatives to support development.	The SESplan Action Programme seeks to deliver strategic transport interventions to support development. More local initiatives will be set out in LDPs and Local Transport Plans.	Not required in this instance
D15	312, 520	Need for discussion between developers/land owners and LPAs and SDPA on delivery issues. Need to work together.	There is a proposed workshop between Homes for Scotland and SESplan members on delivery issues.	Not required in this instance
D16	434	Need to prioritise action programme.	The next Action Programme will contain details on priorities. This will build on work that is already underway.	Not required in this instance
D17	88	Use compulsory purchase where allocated land is not being developed.	SESplan does not have these powers. These comments will be passed onto Member Authorities and the Scottish Government.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
D18	109	Lower affordable housing requirements to enable delivery.	This would conflict with achieving other strategic goals. Affordable housing requirements are set by LDPs. This comment will be forwarded to Member Authorities.	Not required in this instance
D19	433	Greater critical mass of SDAs required to allow delivery.	The scale of the SDAs has been assessed through a robust site assessment exercise. LDPs will allocate specific sites within SDAs.	Not required in this instance
D20	556	Low cost and low infrastructure sites required.	All sites have a cumulative impact on infrastructure.	Not required in this instance
D21	550	Do not maintain the status quo of simply relying on allocated sites/ commitments which are undeliverable in their current form.	LDPs will review the level of allocations required to deliver the housing requirement.	Not required in this instance
D22	34, 46, 60, 246, 475	The distribution of the SESplan housing requirement is deliverable.	Noted.	Not required in this instance
D23	99	Housing will only be delivered if it is in housebuilders interests.	Completions will need to increase from recent levels. SESplan and Member Authorities will be working with the development industry, key agencies and the Scottish Government to increase housing delivery rates towards delivering a long term strategy.	Not required in this instance
D24	275	Land delivery is only the start of the building process.	This is acknowledged.	Not required in this instance
D25	518, 477	No comment on delivery.	Noted.	Not required in this instance
D26	247	Build houses where there is a local need and not for the convenience of developers.	It is an aim of the Supplementary Guidance to meet housing need where it arises.	Not required in this instance
D27	277	Landowners to be offered incentives/generous terms to enable delivery.	This is not within the remit of SESplan. The comments will be forwarded to the Scottish Government.	Not required in this instance
<b>E - Density</b>				
E1	162, 168, 163, 167, 164, 431	Increasing densities as a mathematical exercise is simplistic and does not deliver sustainable development.	Densities of specific developments is an LDP matter. However, higher density developments are more sustainable as they support sustainable transport more easily than low density development and are a more efficient use of land. Densities will be set appropriate to their context. NPF3 paragraph 2.19 refers to increasing density in cities to accommodate growth.	No change on density
E2	577, 237, 291	Densities should be increased and minimum requirements set.	Densities will be set appropriate to their context.	No change on density

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
<b>F - Effective Supply</b>				
F1	13, 19, 14, 20, 16, 430, 451, 456, 313, 449	If the process was undertaken in a robust manner the effective supply would be smaller and the additional housing land requirement larger as a result. It is questioned.	The process was undertaken using HLA 2012, which was the most recent information available during preparation. Effective supply is to be reviewed during LDP preparation to meet the requirements set out in table 3.1. This is set out in the Approved SDP and the Supplementary Guidance.	Not required in this instance
F2	455, 419, 290, 387	Question developers role in effective land process	SESplan made representations to the Scottish Government on the operation of the 5 Year Land Supply process and effective land for the review of SPP. The issue is being considered by the Scottish Government.	Not required in this instance
F3	308, 430, 497	Insufficient explanation as to the how the housing land supply has been calculated and how this is based on Housing Land Audit 2012.	The figures are based on HLA 2012 which are available from each member authority.	Not required in this instance
F4	16, 22	Housing Land Audit 2012 is flawed.	Housing Land Audits are agreed by each member authority.	Not required in this instance
F5	447	Need to fully test effectiveness	It is not the role of a Strategic Development Planning Authority to test the delivery and effectiveness of each housing site across the region.	Not required in this instance
F6	136	Need for SG to require LDPs to be informed by an update to date 'call for sites' process.	This is a matter for individual member authorities in preparing their LDPs.	Not required in this instance
<b>G - Further Actions</b>				
G1	213	Quicker review of SESplan	The SESplan SDP2 Main Issues Report will be produced and consulted upon late in 2014.	Not required in this instance
G2	213	Create Edinburgh City Region Masterplan	The SESplan SDP2 Main Issues Report will be produced and consulted upon late in 2014.	Not required in this instance
<b>H - General</b>				
H1	383, 377, 326, 400	Pressure on Councils to permit large, unsustainable, peripheral greenfield development	New development proposals will complement and not undermine the delivery of existing committed development. Whilst brownfield sites will be prioritised, delivery of the housing requirements will required development on greenfield sites.	Not required in this instance
H2	582, 256, 584, 88	Planning by appeal is unsustainable. It leads to landbanking, which should be penalised.	This is not a matter for SESplan but the comments will be forwarded to the Scottish Government.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
H3	257	Outlaw non-determination appeals	This is not a matter for SESplan but the comments will be forwarded to the Scottish Government.	Not required in this instance
H4	488, 54, 137, 436, 561, 355, 50, 95, 100, 562	Financial and developer interests are being promoted over community interests. Communities and the public have not been considered and should be given a say.	Planning is about achieving a sustainable development which often involves a balance between competing interests. There have been opportunities for public and community involvement in the preparation of the SDP. There will be further opportunities during LDP preparation.	Not required in this instance
H5	361	Democratic opinion should be respected	Planning is about achieving a sustainable development which often involves a balance between competing interests. There have been opportunities for public and community involvement in the preparation of the SDP. There will be further opportunities during LDP preparation. Decisions on the Supplementary Guidance will be made by elected representatives.	Not required in this instance
H6	527, 474, 517	Has not worked with house building sector	This is incorrect. The SDPA meet with Homes for Scotland multiple times during the Supplementary Guidance preparation process. The SDPA were all also fully aware of the house building sector's views through the SDP examination process.	Not required in this instance
H7	223, 448, 584, 462	Development should be plan lead not appeal lead	The SDPA supports this.	Not required in this instance
H8	448	Should have undertaken a call for sites	The Supplementary Guidance is informed by site availability information provided by member authorities.	Not required in this instance
H9	282	Language of documents is impenetrable	This will be taken into account when creating future planning documents.	Not required in this instance
H10	505, 25, 282	Further consultation required/consultation inadequate.	Consultation procedures will be considered before future consultations. LDPs will have consultation stages in as part of their preparation.	Not required in this instance
H11	354, 347	Website is difficult to use.	We will raise this with the organisation that operate the Consultation Portal	Not required in this instance
H12	109	Rural development requires to be support by public transport and broadband access	Initiatives are underway to increase broadband access and public transport accessibility in rural area. The Borders Railway is one such project seeking to improve public transport accessibility in rural areas. These comments will be passed onto the Scottish Government.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
H13	248	Matching new housing with jobs in rural areas	The SDP seeks to grow the rural economy.	Not required in this instance
H14	118	Guidance should show the split between existing LDPs and new demand	The Supplementary Guidance shows the current existing land supply.	Not required in this instance
H15	282	No attention to environmental impacts of proposals	Environmental designations were considered as part of the spatial strategy process. The specific impacts of development will be considered as part of the site masterplanning, design and development management processes. An Strategic Environmental Assessment accompanied the draft Supplementary Guidance which examined its potential environmental impacts and mitigations.	Not required in this instance
H16	238	Build smaller house-types to meet need	This comments will be forwarded for LDPs to consider.	Not required in this instance
H17	546	Errors in tables 8.17 and 8.19	This is acknowledged and will be rectified.	Correct error.
H18	73, 77	Flood risk should be assessed/given more consideration	Flood risk is assessed as part of the updated Spatial Strategy Assessment. Flood risk is addressed in approved SDP policy 15.	Not required in this instance
H19	511, 319	Development plans should operate as business plans for investment	A key focus of the SDP is promoting investment and economic growth.	Not required in this instance
H20	407	Where are the jobs to match the additional houses.	A key focus of the SDP is promoting investment and economic growth.	Not required in this instance
H21	559	Economic sites should be protected.	It is not proposed to develop housing on quality economic development sites.	Not required in this instance
H22	55	The process should begin again free of vested interests.	The SDP was approved by Scottish Ministers. Involvement is sought from all interested parties.	Not required in this instance
H23	61	Housing should be built to the highest efficiency and design standards.	This is supported and will be addressed in LDPs.	Not required in this instance
H24	88	Development should create pleasant environments	SESplan and our Member Authorities wish to help deliver quality development. Place making is recognised in the SDP. Detailed design policies will be set out in LDPs.	Not required in this instance
H25	8	Promoting the Sports Scotland plan making toolkit.	The toolkit is welcomed and our member authorities will utilise it in LDP preparation.	Not required in this instance
H26	62, 81, 89, 101, 111, 176, 221, 239, 258, 401	No further comment.	Noted.	Not required in this instance



Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
<b>I - Generosity</b>				
I1	178, 184, 190, 196, 315, 555, 592, 497, 498	The land requirement should be a factor of 20% or more higher than the number of house units/need for flexibility allowance.	Approved SDP policy 6 sets out the position on housing land flexibility. Percentage requirements are not set out in the current SPP.	Not required in this instance
I2	413	SPP is not clear on the definition of a generous supply.	This is being looked at in the review of SPP.	Not required in this instance
I3	271	The guidance should allow for housing developments in sustainable locations to be permitted to allow for sites to come forward.	Approved SDP policy 6 sets out the position on housing land flexibility.	Not required in this instance
<b>J - Green Belt</b>				
J1	119, 234, 294, 327, 378, 414, 426, 488, 412, 333, 480, 336, 331, 90, 142, 137, 169, 394, 110, 321, 320, 343, 334, 391, 107, 249, 96, 402, 487, 49, 565, 222, 425, 453, 332, 349, 91, 390, 376, 241, 328, 33, 337, 357, 400, 355, 585, 578, 567, 285	The Green Belt should be protected for the benefits it provides.	The Green Belt was examined in the Spatial Strategy Assessment for both the SDP and the update in the Supplementary Guidance. The importance of the Green Belt and its purposes are acknowledged in SDP Policy 12. SDP Policy 7 requires development not to undermine Green Belt objectives. SDP Policy 12 requires LDPs to define green belt boundaries ensuring that strategic growth requirements are met. Some green belt land may be needed to meet housing requirements.	Not required in this instance
J2	313, 538, 525, 458	SESplan should establish the need for the Green Belt and whether it should be retained or released and undertake a broad review of its area. Continued erosion will lose all control.	The approved SDP sets out Green Belt policies. A study of the Green Belt was undertaken in 2008 to inform the SDP. SDP Policy 12 requires LDPs to define green belt boundaries ensuring that strategic growth requirements are met. Some green belt land may be needed to meet housing requirements.	Not required in this instance
J3	324, 357, 585	The Green Belt prevents urban sprawl.	This is acknowledged but not stated in Scottish Planning Policy. They maintain the landscape setting of settlements and help direct planned growth to the most appropriate locations.	Not required in this instance
J4	235, 293, 488, 691, 96	The figures would lead to unacceptable pressures on the Green Belt and impact on biodiversity.	SDP Policy 7 requires development not to undermine Green Belt objectives.	Not required in this instance
J5	447, 529, 441	Green Belt and landscape concerns are outweighed by the need to meet housing need where it arises.	This statements is not consistent with SPP and the approved SESplan SDP. SDP Policy 7 requires development not to undermine Green Belt objectives.	Not required in this instance
J6	299, 419	The Scottish Government should be clearer about protecting or developing Green Belt.	This comments will be forwarded to the Scottish Government	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
J7	84, 85	Suitable Green Belt opportunities must be taken up in Edinburgh and Midlothian in association with existing and potential public transport availability.	The development of the SDAs will involve long planned green belt releases to support development in accessible locations.	Not required in this instance
J8	438	Contradiction between prioritising brownfield and level of Green Belt development.	LDPs are required to prioritise deliverable brownfield sites before requiring greenfield allocations.	Not required in this instance
J9	489	Acknowledge there may be a need to build upon Green Belt land but concerned at the extent to which this is taking place.	The development of the SDAs will involve long planned green belt releases to support development in accessible locations.	Not required in this instance
J10	566	Further justification for Green Belt release must be provided.	SDP Policy 7 requires development not to undermine Green Belt objectives.	Not required in this instance
J11	309	It is entirely appropriate at the point in the Development Plan cycle where strategic and local policy is under review to undertake a more radical review of Green Belt boundaries.	The approved SDP sets out Green Belt polices. A study of the Green Belt was undertaken in 2008 to inform the SDP. Both the SDP and the Supplementary Guidance do not support continued erosion of the Green Belt.	Not required in this instance
<b>K - Housing Needs and Demand Assessment / Housing Market Area Assessment</b>				
K1	232, 237, 10, 418, 128, 407, 384, 249, 573, 350	Question the projections and the need and demand figures.	The Housing Need and Demand Assessment (HNDA) was approved as robust and credible by the Centre for Housing Market Research (CHMA). The requirement to meet the overall housing need figures was a requirement of the Scottish Government.	Not required in this instance
K2	519, 528, 530, 541, 517	The strategy should follow the Housing Market Area Assessment evidence redistributing 19% of Edinburgh's need and demand to East Lothian first followed by West Lothian, Midlothian and then Fife.	The setting of a housing requirement meeting housing need is more complex than an analysis of past private housing sales. For the SDP the whole of SESplan was regarded as a single housing market area. The suggested approach also do not take account of opportunities and constraints and capacities relating to the environment and infrastructure. The supplementary guidance balances the principle of seeking to meet need and demand where it arises with the capacity and constraints analysis and market and deliverability considerations whilst, aiming to achieve wider policy and strategy goals. It should be noted that 4,000 of Midlothian's housing requirement will be delivered in the South East Edinburgh SDA.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
K3	507, 224	The strategy should start from a point of asking whether the pattern of demand in the Housing Need and Demand Assessment can be met.	For the SDP the whole of SESplan was regarded as a single housing market area. The supplementary guidance balances the principle of seeking to meet need and demand where it arises with the capacity and constraints analysis and market and deliverability considerations whilst, aiming to achieve wider policy and strategy goals. As set out in approved SDP, Edinburgh cannot fully meet all the housing need and demand that arises there within its LDP boundaries. It should be noted that 4,000 of Midlothian's housing requirement will be delivered in the South East Edinburgh SDA.	Not required in this instance
K4	104, 329	Question whether there is a market for the level of housing. There is no evidence to suggest that 29,500 houses are needed in Edinburgh.	The HNDA was approved as robust and credible by the CHMA. The requirement to meet the overall housing need figures was a requirement of the Scottish Government.	Not required in this instance
K5	577	The figures are based on GRO estimates which are themselves based on estimates and trends and take no account of the economic situation.	The HNDA was approved as robust and credible by the CHMA. The requirement to meet the overall housing need figures was a requirement of the Scottish Government.	Not required in this instance
<b>L - Infrastructure</b>				
L1	134, 135, 445, 311, 312, 165, 474, 117, 368, 500, 557, 511, 319	Need for greater infrastructure investment from public sector and Scottish Government and involving the use innovative funding solutions.	Investigations into infrastructure delivery and funding are underway with public and private sector involvement. The comments will be passed onto the Scottish Government.	Not required in this instance
L2	374, 445, 311, 447, 283, 88, 368, 511	Plans must be realistic regarding developer funded infrastructure	This is acknowledged.	Not required in this instance
L3	411, 116, 88	Infrastructure before development	Infrastructure will be phased appropriately to be delivered when required.	Not required in this instance
L4	264, 557	Infrastructure requirements to be phased for when required.	Infrastructure will be phased appropriately to be delivered when required.	Not required in this instance
L5	84, 85	There must be grade separation at Sheriffhall junction and improvements at Old Craighall junction.	Studies are being undertaken to identify interventions and costs for these junctions.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
L6	557	Education and transport are the key constraints	This is acknowledged in the infrastructure assessment in the Technical Note.	Not required in this instance
L7	69	Infrastructure providers to be proactive	There is ongoing liaison with infrastructure providers, particularly focussing on funding the required infrastructure.	Not required in this instance
L8	257	Need for co-ordinated infrastructure review	Strategic infrastructure requirements for the SESplan area are set out in the Action Programme and will be reviewed as part of the process for preparing the next SDP. They will also be reviewed as part of LDP preparation. Further investigations into infrastructure delivery and funding are underway with public and private sector involvement.	Not required in this instance
L9	69	Education capacity should not prevent development	Development cannot be accommodated if the essential infrastructure requirements are not met.	Not required in this instance
L10	209	Paragraph 5.37 of the Technical Note and the reference to Transport Scotland is not understood. It is for the agency to carry out the necessary improvements.	Further investigations are underway into the funding of trunk road improves related to development.	Not required in this instance
L11	308	The Guidance needs to responsibly address the provision of strategic infrastructure.	Strategic infrastructure requirements for the SESplan area are set out in the Action Programme and will be reviewed as part of the process for preparing the next SDP. They will also be reviewed as part of LDP preparation. Further investigations into infrastructure delivery and funding are underway with public and private sector involvement.	Not required in this instance
L12	386	The Edinburgh LDP does not fully consider existing capacity issues at key junctions leading into Edinburgh.	The Edinburgh LDP is accompanied by a transport appraisal with mitigation measures identified through the LDP Action Programme.	Not required in this instance
L13	482	As the Capital City of Scotland, steps should be taken to remove barriers to development to prevent stagnation.	SESplan and partners wish to see the infrastructure barriers to economic growth and development removed. The SESplan response to NPF3 focussed on the issue of infrastructure provision to promote growth. Further investigations into infrastructure delivery and funding are underway with public and private sector involvement.	Not required in this instance
L14	434	Infrastructure constraints without support will lead to non-effective sites	Investigations into infrastructure delivery and funding are underway with public and private sector involvement.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
L15	139	Combining the West Edinburgh and Fife totals, the Forth Bridge and roads into the City cannot take the extra vehicles. It may be necessary to introduce tolls.	Whilst this is not a consideration for the Supplementary Guidance, the comments will be forwarded to Transport Scotland.	Not required in this instance
<b>M - Key Agency</b>				
M1	40, 44, 45	SNH cannot comment on need and demand.		Not required in this instance
M2	74, 75, 80	SEPA cannot comment until a Strategic Flood Risk Assessment has been undertaken. The re-assessment only considers Scottish Water infrastructure and not other issues related to water management. The impacts on ground and surface water within the South East Edinburgh SDA are of considerable concern.	Comments noted. However, the issues raised by SNH and SEPA are outside the remit of the Supplementary Guidance which focuses on setting a housing land requirement. The spatial strategy, design and flooding issues are addressed in the approved SDP. Work is underway on a Strategic Flood Risk Assessment for the SESplan area.	Not required in this instance
M3	266	Historic Scotland has no specific comments in relation to the actual breakdown and distribution of the additional allowances within or outwith SDAs. Would note the allocation of additional housing land increases the potential for impacts on the historic environment.	The SEA Environmental Report sets out a strategic assessment of the potential for impacts on the historic environment.	Not required in this instance
M4	171, 172, 173	Scottish Government are content with Table 3.1 subject to the responses to Questions 5 and 6 (Delivery) (Responses 174 and 175).	Noted.	Not required in this instance
M5	174, 175	Need to understand impacts on infrastructure, including cross boundary and cumulative.	Following the transport appraisal work on the SDP and Supplementary Guidance, further work is underway with Transport Scotland, SEStran and Member Authorities to further understand these impacts.	Not required in this instance
M6	174, 175	Spatial strategy is questionable without a clear mechanism for delivering and funding infrastructure	The Spatial Strategy is set out in the SDP which was approved by Scottish Ministers. Work is underway with Transport Scotland, SEStran and Member Authorities to further understand these impacts. All key parties, including the Scottish Government, will have a role in funding infrastructure in the SESplan region.	Not required in this instance
M7	47, 76, 79	SNH and SEPA wish to work with SESplan and member authorities to assist in the delivery of development.	Assistance from SNH and SEPA is acknowledged and welcomed.	Not required in this instance
M8	48	SNH support the design led approach.	This is welcomed as SESplan also support the design led approach. However, the Supplementary Guidance has a specific housing requirement remit.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
<b>N - Landscape Designations</b>				
N1	234, 294, 378, 348	Important landscapes should be protected.	Landscape designations were considered as part of the planning considerations in setting the Spatial Strategy in the approved SDP and in preparing the Supplementary Guidance.	Not required in this instance
<b>O - Paragraph 3.8</b>				
O1	13, 14, 20, 210	It is inappropriate of the Strategic Development Planning Authority to abdicate responsibility to LDPs.	The strategy is set out in the approved SDP. The Supplementary Guidance does not abdicate responsibility as development is directed towards the SDAs. Development outwith SDAs will be required to be in compliance with policy 7. The Supplementary Guidance meets the requirements of approved SDP Policy 5.	Not required in this instance
<b>P - Paragraph 3.9</b>				
P1	509, 366, 372, 508	Does not accord with SDP Policy 7 as amended by Ministers.	This is incorrect. Policy 7 relates to LDP and 5 Year Land Supply issues at LDP level.	Not required in this instance
<b>Q - Policy</b>				
Q1	300, 237, 488, 492, 493, 333, 324, 225, 419, 90, 137, 394, 321, 320, 343, 249, 487, 49, 425, 453, 349, 383, 398, 399, 573, 377, 380, 381, 382, 344, 241, 330, 50, 298	Delivery of the housing requirement on greenfield land / unsustainable locations will lead to outcomes opposite of the Government's and SESplan's sustainable goals and aims.	The Supplementary Guidance and the approved SDP have taken a balanced and considered approach. It acknowledges that housing need has to be met but this has to be informed by both the SDP and Scottish Government aims as well as infrastructure and environmental opportunities and constraints. The delivery of housing will contribute towards economic growth.	Not required in this instance
Q2	208, 369, 189, 193, 539, 433, 161, 164, 440, 529, 363, 495, 481, 540, 544, 288, 526	Non compliance with SPP - supply not directed to demand / delivery areas.	This is incorrect. The Supplementary Guidance has to achieve a careful balance of directing housing requirements to areas of deliverable housing demand as well as achieving wider policy goals and factoring in other consideration including housing need and infrastructure and environmental constraints, capacities and opportunities. No one consideration is given crowning importance over another.	Not required in this instance
Q3	519, 528, 523, 532, 536, 543	The methodology appears to identify the Additional Allowances first and then confirm a housing land requirement. This is contrary to SDP Policy 5 and SPP.	The methodology analyses the capacity of each area to accommodate further development. This is considered alongside the principle of meeting housing demand at origin and the environmental and infrastructure capacities and constraints assessments.	Clarify wording in section 5 and 6 of the technical note. This to clarify the methodology undertaken.

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
Q4	236, 310, 366, 372	Allocating Additional Allowances is a departure from the approved SDP which sets the 13 SDAs as the primary locations for development. This strategy is not properly justified.	The Supplementary Guidance does not allocate additional allowances. They are an indication of the level of additional supply required at present to meet requirements. Their scale is based upon capacity and suitability assessments undertaken by Member Authorities in conjunction with the SDPA.	Not required in this instance
Q5	260, 63, 469, 57, 112, 240, 242	Accords with Policy.	Noted.	Not required in this instance
Q6	67	Would wish to see the approach remain as in the draft document since currently the Outwith SDA requirements are referred to as suggestions and the levels described as indications. This approach is consistent with the flexibility requirements specifically SDP Policies 6 and 7, SPP and draft SPP.	Noted.	Not required in this instance
Q7	590	Table 3.2 is contrary to established planning policy in that it has allocated in excess of 20% of sites Outwith SDAs.	Identifying capacity outwith SDAs is in accords with the approved SDP. The Supplementary Guidance does not allocate sites for development.	Not required in this instance
Q8	229	SPP should allow for realistic plans.	Agree.	Not required in this instance
Q9	485	Use of windfall contrary to guidance.	This statement is incorrect. The use of a windfall allowance accords with approved SDP Policy 5.	Not required in this instance
Q10	517	Use of constrained land contrary to SDP and SPP.	It is a requirement of LDPs to re-assess land supply during LDP preparation. The land supply calculations were based on HLA 2012.	Not required in this instance
Q11	268	Requires presumption in favour of sustainable development.	This is not current policy.	Not required in this instance
Q12	307	Improve references to SPP on housing and Green Belt.	References to housing and green belt are set out the approved SDP.	Not required in this instance
Q13	517	Additional allowances 2019-2024 contrary to SPP.	The additional allowances set out in table 3.2 are an indication of the potential contribution that each SDA could make towards meeting the housing requirements. These figures will need to be re-assessed in LDPs to demonstrate that the requirements of SDP paragraph 113 have been met.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
Q14	208	Non compliance with SPP - requirement not linked to infrastructure delivery.	The requirement is linked to infrastructure delivery. Approved SDP Figure 2 and the Action Programme set out the strategic infrastructure required to support the strategy. Further detail will be contained in LDPs.	Not required in this instance
Q15	26	Role of SDPA to confirm compliance with SPP.	Noted.	Not required in this instance
Q16	43, 78, 82, 513, 576, 583	No comment on SPP compliance.	Noted.	Not required in this instance
Q17	103, 122, 339	Cannot confirm compliance until SPP review is complete	The Supplementary Guidance should comply with adopted Scottish Planning Policy not draft guidance. Due to required timescales, the timetable for the production of the Supplementary Guidance cannot be delayed to accommodate the review of SPP.	Not required in this instance
Q18	170	Accords with SPP subject to transport concerns being met.	Noted. Further work is underway to continue to address transport infrastructure delivery issues.	Not required in this instance
<b>R - Prime Agricultural Land</b>				
R1	32, 51, 234, 294, 327, 378, 489, 577, 33, 300, 488, 581, 322, 249, 96, 425, 479, 383, 377, 382, 330, 437, 585, 39, 272	Prime agricultural land should be protected / prevent loss.	Prime agricultural land was considered as part of the planning considerations in setting the Spatial Strategy in the approved SDP and in preparing the Supplementary Guidance.	Not required in this instance
R2	581	Need for the Scottish Government to set out how much Agricultural land to be retained.	This comment will be forwarded to the Scottish Government.	Not required in this instance
R3	478	Important to recognise the loss of agricultural land.	Prime agricultural land was considered as part of the planning considerations in setting the Spatial Strategy in the approved SDP and in preparing the Supplementary Guidance.	Not required in this instance
<b>S - Strategy</b>				
S1	463, 507, 519, 528, 429, 439, 179, 185, 191, 197, 369, 452, 527, 427, 282, 363, 495, 506, 215, 481, 517, 440	No justification to explain the distribution.	The reasoning for the distribution is set out in the accompanying Technical Note summarised in paragraphs 3.3 and 3.4 of the Supplementary Guidance. For clarity, this summary will be expanded in the Supplementary Guidance.	Expand the summary of justification of the distribution of the housing requirement in the Supplementary Guidance.
S2	373, 165, 166, 533, 535, 367, 506, 510, 511, 485, 545, 289, 440, 564, 303	Housing should be delivered to areas of demand and where housebuilders believe investment can be delivered.	The Supplementary Guidance and the approved SDP have taken a balanced and considered approach. It acknowledges that housing need has to be met but this has to be informed by both the SDP and Scottish Government aims as well as policy drivers and infrastructure and environmental opportunities and constraints.	Not required in this instance



Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
S3	430, 431, 548	The refresh of the assessment is selective, subjective, arbitrary and contradicts statements made in MIRs and Proposed LDPs.	This is incorrect. The refresh of the Spatial Strategy Assessment was agreed with Member Authorities. It is acknowledged that there is a typographical error in tables 8.17 and 8.19.	Not required in this instance
S4	431	It is not evident how the refresh has weighted economic and other benefits of delivery against environmental impact or how this is reflected in the distribution of the additional allocations.	Delivery of development and economic impact is not directly weighed against environmental impact. Setting a housing requirement requires more subtlety. Delivery considerations are required for all housing locations. The economic benefits of housing delivery is acknowledged.	Not required in this instance
S5	527, 164. 529, 510, 540, 517	Must be sustainable and not lead to commuting back to Edinburgh	The majority of the of the housing requirement identified will be located within Edinburgh or it's immediate hinterland. 4,000 dwellings of Midlothian's requirement will be developed in the South East Edinburgh SDA. Based on committed development a significant proportion of development will be located in accessible locations near Edinburgh in northern Midlothian, eastern West Lothian and western East Lothian. Sustainability is a balance of many, often competing considerations.	Not required in this instance
S6	507, 369, 506, 517, 440	The re-assessment of capacities and constraints is weak. The assessment of SAAs 9, 10, 11, 21, 22 and 23 is superficial.	The assessments are built on wider evidence set out in earlier tables in the appendices as well as LDP evidence base work.	Not required in this instance
S7	494, 223, 257	Will lead to piecemeal development not linked to infrastructure planning	A plan led system should prevent piecemeal development.	Not required in this instance
S8	84, 85, 444, 252	There must be recognition of capacity constraints relating to existing communities.	A capacities and constraints analysis was undertaken when preparing the Supplementary Guidance. LDPs will also undertake a similar local level analysis. It should be noted that new development can fund infrastructure and service improvement which increase capacities and remove constraints.	Not required in this instance
S9	441, 512	Plan is wedded to outdated ideas on brownfield, green belts, delivering housing and dispersal of housing.	Disagree. The approved SDP and Supplementary Guidance strikes an appropriate balance between the three elements of sustainable development to achieve SESplan and Scottish Government aims and objectives.	Not required in this instance
S10	501	Strategy justification should be brought into SG	The reasoning for the distribution is set out in the accompanying Technical Note summarised in paragraphs 3.3 and 3.4 of the Supplementary Guidance. For clarity, this summary will be expanded in the Supplementary Guidance.	Expand the summary of justification of the distribution of the housing requirement in the Supplementary Guidance.

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
S11	118	Moving housing need out of Edinburgh leads to large houses being built for commuting families which don't meet needs of communities.	Meeting strategic housing need acknowledges the movement of people away from their existing communities. The economic needs of Edinburgh are greater than it's capacity to house its requirements.	Not required in this instance
S12	527	Environmental constraints are exaggerated	Environmental considerations are given an appropriate weighting in line with SPP and the approved SDP. The SEA also informed the preparation of the Supplementary Guidance.	Not required in this instance
S13	512, 441	SDP lacks strategic vision	The Strategic Vision for the SDP was approved by Scottish Ministers.	Not required in this instance
S14	486	Resolve barriers and constraints rather than avoiding them	Where possible, measures are being explored and taken to overcome capacities and constraints. However, some environmental constraints cannot be overcome.	Not required in this instance
S15	435	Focus development away from Green Belt and Edinburgh and towards regional towns	Development must located in and near to Edinburgh to support the economy and reduce the need to travel.	Not required in this instance
S16	164	Need to acknowledge housing in growing economy	This is acknowledged.	Not required in this instance
<b>T - Table 3.1</b>				
T1	178, 184, 190, 196	The title of Table 3.1 is misleading.	Table 3.1 sets out the housing land requirement for each LDP area as required by SDP Policy 5. The title is in accordance with this.	Not required in this instance
T2	25	The table should breakdown the figures in the period 2024 - 2032 by authority.	This is not required by the approved SDP.	Not required in this instance
T3	27, 58, 65, 228, 243, 468	Agree with Table 3.1. The allocations are consistent with the numbers in the Scottish Ministers approval letter. Agree there is justification for this allocation.	Noted.	Not required in this instance
T4	551	The greatest challenge lies at the local level where sites for additional allowances must be found. Concur with the view that those authorities best placed, strategically to deliver additional housing take a proportion of the City's need and demand.	Noted.	Not required in this instance
<b>U - Table 3.2</b>				
U1	521, 531, 534, 542, 523, 532	Including these figures goes beyond what is required by SPP and SDP Policy 5. There is a risk these figures could be misinterpreted as housing land shortfalls.	The additional allowances set out in table 3.2 are for indicative purposes. These figures will need to be re-assessed in LDPs to demonstrate that the requirements of SDP paragraph 113 and the Supplementary Guidance.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
U2	15, 21	Table should be renamed 'Additional Requirement' to comply with SDP and SPP.	The table does not set out an additional requirement. It is the level of housing that is required, at present, in each SDA and outwith SDAs to meet the housing requirements in table 3.1.	Not required in this instance
U3	15, 21	The figures in table 3.2 are too low.	The figures are based on capacity assessment work undertaken in conjunction with the opportunities and constraints analysis. They will be re-assessed as part of LDP preparation.	Not required in this instance
U4	138, 102	Question the wisdom of Outwith SDA Allowances just in Edinburgh, Fife and the Scottish Borders. There are many small sites across the SESplan area which could contribute.	Development is to be focussed in SDAs where there is capacity that is consistent with the spatial strategy and aims of the SDP.	Not required in this instance
U5	21	There is no mechanism within the SDP that allows the separation of within and outwith SDAs.	This is set out in approved SDP paragraph 116 and Policy 7.	Not required in this instance
U6	532	Table 3.2 should be deleted.	Table 3.2 sets out the level of housing that is required, at present, in each SDA and outwith SDAs to meet the housing requirements in table 3.1. These will be re-assessed during LDP preparation. The table will not be deleted.	Not required in this instance
U7	495	Need for guidance on locations of development outside SDAs	Exact locations will not be set out. Policy 7 in the Approved SDP sets out criteria for the assessment of sites outside SDAs. The supplementary guidance cannot identify other SDAs or contradict the spatial strategy set out in the Approved SDP.	Not required in this instance
U8	115	The Allowances would be better defined as SDAs.	The allowances are an indication, at the present time, of the potential contribution each SDA could make towards the housing land requirement. They will be re-assessed during LDP preparation.	Not required in this instance
U9	28, 59, 66, 114, 131, 132, 227, 244, 415, 420, 442, 464, 86, 133, 218, 226, 245, 549	Agree with Table 3.2.	Noted.	Not required in this instance
U10	52, 140, 217, 304, 309, 340, 379, 404, 141, 147, 284, 305, 341, 362, 389, 405, 416, 424, 560	Does not agree with Table 3.2.	Table 3.2 sets out the level of housing that is required, at present, in each SDA and outwith SDAs to meet the housing requirements in table 3.1. These will be re-assessed during LDP preparation. The figures within the table were based on the assessments detailed in the Technical Note.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
<b>V - Windfall</b>				
V1	13, 19, 162, 168, 308, 14, 20, 163, 533, 544, 509, 531, 542, 167, 508, 532, 543	The figures are based on unsubstantiated assertions and overstated.	The figures are based on a thorough analysis of windfall trends in each member authority area. Policy 5 of the approved SDP allows for a justified allowance from windfall sites.	Not required in this instance

## Summary of Main Issues (Member Authority)

The full responses are available to view and download at -

<http://sesplan-consult.objective.co.uk/portal/sg/hsgland>

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
<b>W - City of Edinburgh</b>				
W1	104, 426, 123, 139, 233, 439, 148, 150, 428, 402, 565, 569, 202, 350, 437, 567, 124, 146, 231, 421, 422, 568, 359, 421	Cammo should not be included within West Edinburgh since it has no access to the tram, experiences severe traffic congestion and has infrastructure constraints (education and transport).	The exact boundaries and sites within the West Edinburgh Strategic Development Area (SDA) is a matter for the City of Edinburgh Local Development Plan.	Not required in this instance
W2	125	Question need for Cammo site given uncompleted sites across the city	There is an insufficient supply of existing sites to meet housing need requirements over the plan period.	Not required in this instance
W3	150, 571, 350, 437, 325	Development would affect setting and environment of Cammo estate	The exact boundaries and sites within the West Edinburgh SDA a is a matter for the City of Edinburgh LDP.	Not required in this instance
W4	411, 333, 324, 480, 336, 331, 90, 137, 169, 394, 322, 110, 321, 320, 343, 249, 96, 487, 49, 425, 453, 349, 91, 390, 241, 64, 337, 400, 355, 585, 296, 490	Balerno cannot accommodate new development due to infrastructure capacity issues (education and transport). The Lanark Road is congested.	The allocation of sites outwith SDAs is a matter for the City of Edinburgh LDP.	Not required in this instance
W5	333, 90, 336, 137, 320, 343, 391, 249, 487, 49, 425, 332, 241, 64, 328, 337, 355, 585	Balerno is not accessible to employment. Accessible areas in city should be developed instead.	Table 8.19 of the technical note identifies that South West Edinburgh is the 5th most accessible Strategic Assessment Area to employment in the entire SESplan Region.	Not required in this instance
W6	113, 162, 168, 261, 274, 364, 370, 408, 450, 496, 519, 528, 302, 164, 499, 483, 484, 454	The need and demand for housing is predominately generated by Edinburgh and should be accommodated there.	The majority of the housing requirement set out in the Supplementary Guidance will be provided in Edinburgh or its hinterland.	Not required in this instance
W7	527, 529, 363, 540, 517	No evidence of environment or infrastructure reasons why Edinburgh cannot meet need.	These are set out in the spatial strategy assessment tables in the Technical Note.	Not required in this instance
W8	234, 295, 403, 145, 204, 233, 250, 286, 297, 127, 406, 465	The figures for Edinburgh are too high.	Edinburgh is a source of both housing need and demand. Where environmental and infrastructure considerations allow and where consistent with the approved SDP, a generous supply of housing need should be met there.	Not required in this instance
W9	267, 450, 302, 269, 288, 451, 456, 572, 454	More land should be identified to the west of Edinburgh.	West Edinburgh is identified as an SDA in the approved SDP	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
W10	201, 444, 388, 443, 404, 389	The allocation of 2,700 dwellings in West Edinburgh should be removed or substantially reduced due to the potential impacts on traffic and education constraints.	West Edinburgh is identified as an SDA in the approved SDP. The exact level of housing allocated in the SDA will be set out the Edinburgh LDP. In the balance of considerations, which include infrastructure, West Edinburgh is considered a suitable and sustainable location for a strategic level of development.	Not required in this instance
W11	202	Solutions to accommodate growth in West Edinburgh will not be effective.	The solutions are being refined in the City of Edinburgh LDP and through work with Transport Scotland.	Not required in this instance
W12	105	The green belt around West Edinburgh should remain as it is.	SDP Policy 12 requires LDPs to define green belt boundaries ensuring that strategic growth requirements are met. Some green belt land in West Edinburgh may be needed to meet housing requirements.	Not required in this instance
W13	251	West Edinburgh bears a disproportionate share of proposed development.	The development of West Edinburgh is part of a long term strategy. It is not the largest Strategic Development Area set out in the SDP or compared to strategic sites in existing plans.	Not required in this instance
W14	203, 446	Garden District preferable to West Edinburgh	The Garden District is not a SDA and it is not within the remit of the Supplementray Guidance to identify further SDAs. Its suitability to meet housing requirements will be assessed in the Edinburgh LDP.	Not required in this instance
W15	535	Garden District more effective than diverting need to other authorities.	The Garden District is not a SDA and it is not within the remit of the Supplementray Guidance to identify further SDAs. Its suitability to meet housing requirements will be assessed in the Edinburgh LDP.	Not required in this instance
W16	261, 262	Further land within the South East and West Edinburgh SDAs requires to be considered for release along with further land within the North West and South West areas linked to transport corridors.	The Supplementary Guidance does not allocate or identify additional allowances to the North West and South West Edinburgh Spatial Assessment Areas. The South East and West Edinburgh SDAs have been identified as having further development potential in the Supplementary Guidance in table 3.2. Subject to the Edinburgh LDP and in compliance with SDP policy 7, land outside the SDAs can be identified for development. Analysis undertaken for the Supplementary Guidance, and set out in the Technical Note in section 5, indicates that there is capacity and potential for development in the North West Edinburgh and South West Edinburgh Spatial Assessment Areas.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
W17	236, 310	Allocating Additional Allowances within SAAs 9 and 11 is a departure from the approved SDP which sets the 13 SDAs as the primary locations for development. This strategy is not properly justified.	The Supplementary Guidance does not allocate or identify additional allowances to the North West and South West Edinburgh Spatial Assessment Areas. The South East and West Edinburgh SDAs have been identified as having further development potential in the Supplementary Guidance in table 3.2. Subject to the Edinburgh LDP and in compliance with SDP policy 7, land outside the SDAs can be identified for development. Analysis undertaken for the Supplementary Guidance, and set out in the Technical Note in section 5, indicates that there is capacity and potential for development in the North West Edinburgh and South West Edinburgh Spatial Assessment Areas.	Not required in this instance
W18	263	The allowances within North West and South West Edinburgh should be increased.	The Supplementary Guidance does not allocate or identify additional allowances to the North West and South West Edinburgh Spatial Assessment Areas. Whilst the review of environmental capacities and constraints and LDP analysis indicated that there is strategic potential in these locations, the Supplementary Guidance cannot identify these areas as SDAs. New housing in these areas is a matter for the Edinburgh LDP.	Not required in this instance
W19	388, 359, 432	The numbers for South East and West Edinburgh should be reduced.	These areas have been identified as having development capacity that can be accommodated sustainably to contribute towards meeting housing need. Both areas are identified as SDAs in the approved SDP.	Not required in this instance
W20	447, 164	South East Edinburgh is artificially constrained and this is not justified	South East Edinburgh will deliver significant levels of development. It is not being artificially constrained.	Not required in this instance
W21	30	South East Edinburgh road capacity insufficient.	Both the SDP and the Edinburgh LDP are accompanied by transport appraisals which consider road capacity.	Not required in this instance
W22	482, 483	Supportive of the identification of North West Edinburgh (SAA9).	Noted.	Not required in this instance
W23	395	South West Edinburgh is not suitable for strategic growth.	Table 8.19 of the technical identifies that it has potential to accommodate development on a strategic scale. The allocation of development in this area is a matter for the Edinburgh LDP.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
W24	521, 534, 523, 536	Recommend the addition of two SDAs - North West Edinburgh (1,000 homes) and South West Edinburgh (1,500 homes).	The Supplementary Guidance cannot identify further SDAs. The spatial strategy for SESplan is set out in the approved SDP. However, subject to the Edinburgh LDP and in compliance with SDP policy 7, land outside the SDAs can be identified for development. Analysis undertaken for the Supplementary Guidance, and set out in the Technical note in section 5, indicates that there is capacity and potential for development in the North West Edinburgh and South West Edinburgh Spatial Assessment Areas.	Not required in this instance
W25	267, 274, 308, 269	Flexibility should be added to allow for the significant amounts of housing at the Waterfront to come forward should the renewable energy development not proceed as planned. The contribution of Leith Docks needs to be clarified.	The focus is on delivering the approved strategy. If this situation occurs, alternative strategies will be analysed.	Not required in this instance
W26	11, 22, 547, 552	Flatted development at the Waterfront is not deliverable or marketable	Recent HLA information sets out that the waterfront will deliver during and beyond the plan period. The strategy in Edinburgh ensures that the strategy is not dependant on one location.	Not required in this instance
W27	211	The 2,500 Outwith SDAs is inappropriate.	It is in accordance with the approved SDP and is based on a capacity, opportunity and constraints assessment.	Not required in this instance
W28	29	Another SDA should be identified within Edinburgh to accommodate the 2,500 Outwith SDA Allowance.	The Supplementary Guidance cannot identify further SDAs. The spatial strategy for SESplan is set out in the approved SDP. However, subject to the Edinburgh LDP and in compliance with SDP policy 7, land outside the SDAs can be identified for development. Analysis undertaken for the Supplementary Guidance, and set out in the Technical note in section 5, indicates that there is capacity and potential for development in the North West Edinburgh and South West Edinburgh Spatial Assessment Areas.	Not required in this instance
W29	564	Edinburgh should seek deliver build for market rent properties.	Issue for exploration in the Edinburgh LDP and future housing market analysis.	Not required in this instance
W30	482	Further detail should be provided on the barriers and constraints to development in the Edinburgh City area.	Set out in the Technical Note, its appendices and the evidence base produced for the SDP and the Edinburgh LDP.	Not required in this instance
W31	31	Road improvements in and around Edinburgh required	This is acknowledged. The SDP and Action Programme sets out the strategic improvements that are required. More detail will be set out in the Edinburgh LDP and its accompanying Action Programme.	Not required in this instance



Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
W32	497, 498	On what basis has the reprogramming of Brownfield land within Edinburgh been undertaken.	In accordance with SPP and NPF3.	Not required in this instance
W33	232	Support some of CEC demand being met elsewhere	Noted.	Not required in this instance
W34	548	Further planned expansion of housing allocations is feasible and desirable in the City of Edinburgh area.	The housing requirement for Edinburgh is based on meeting need and demand whilst recognising the infrastructure and environmental capacities and constraints.	Not required in this instance
W35	126	Plans should improve Edinburgh	Development presents opportunities to make social, environment and economic improvements to an area.	Not required in this instance
<b>X - East Lothian</b>				
X1	602, 599, 600, 603, 152, 601, 604, 605, 606	Development of Goshen farm is not justified because of: infrastructure capacity, transport capacity, cultural and heritage impacts, sustainability, and environmental impacts. Other areas in East Lothian should be considered instead.	The sites within the East Lothian SDA is a matter for the East Lothian LDP. The comments have been forwarded to East Lothian Council.	Not required in this instance
X2	184, 196, 216, 555, 220, 551, 217	A greater proportion of Edinburgh's need and demand should be directed to East Lothian.	The East Lothian housing requirement recognises its role and position adjacent to Edinburgh.	Not required in this instance
X3	538, 215, 525	Additional capacity in East Lothian not explained / arbitrary.	The requirement of East Lothian was based on the assessment of constraints, capacities and opportunities as well as site capacity and identification work been undertaken for the East Lothian LDP. However, it is accepted that the <b>Technical Note could be clearer in this matter.</b>	Clarifications to sections 5 and 6 of the Technical Note for clarity is required.
X4	151	Consider sites in Western East Lothian that do not affect area around Wallyford.	The sites within the East Lothian SDA is a matter for the East Lothian LDP. The comments have been forwarded to East Lothian Council.	Not required in this instance
X5	35	East Lothian appears to have the capacity to take more as it is closely situated to Edinburgh where most people will take up employment.	The East Lothian housing requirement recognises its role and position adjacent to Edinburgh. The sites within the East Lothian SDA is a matter for the East Lothian LDP. The comments have been forwarded to East Lothian Council.	Not required in this instance
X6	596	North Berwick cannot accommodate further development without significant impact on infrastructure and the character of the place. New development should only be smaller homes for local people.	North Berwick is outside of the East Lothian SDA. The comments will be forwarded to East Lothian Council.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
X7	51, 9	East Lothian is a rural county which is in danger of becoming urbanised.	The SDP and Supplementary Guidance does not seek to urbanise rural areas. The exact location of housing within East Lothian is a matter for the East Lothian LDP.	Not required in this instance
X8	87	Infrastructure capacity and environmental constraints will restrict development	Constraints, capacities and opportunities were considered in setting the housing requirements for SESplan LDP areas.	Not required in this instance
X9	553	Goshen Farm is located within the East Lothian SDA and can accommodate 1,200 units.	The sites within the East Lothian SDA is a matter for the East Lothian LDP. The comments have been forwarded to East Lothian Council.	Not required in this instance
X10	287	Distribution of East Lothian's allocation should be made to other areas such as the Borders, Edinburghs villages and the west airport side.	The housing requirement sets an appropriate balance, to which East Lothian is required to contribute towards.	Not required in this instance
X11	83	The coastal strip has the most effective and faster public transport links and should be the focus of some allocations.	The coastal strip is not as accessible as other parts of East Lothian.	Not required in this instance
X12	253	East Lothian has already developed considerable housing in the period 2009 - 2019.	Further housing delivery will be required to meet the need for additional housing.	Not required in this instance
X13	465	Question the delivery of the East Lothian requirement	The requirement of East Lothian was based on the assessment of constraints and opportunities as well as site capacity and identification work been undertaken for the East Lothian LDP.	Not required in this instance
<b>Y - Fife</b>				
Y1	35, 274, 338, 345, 360, 514, 279, 352, 598, 502, 503, 516, 575, 276, 346, 353, 272, 574, 465	The figures for Fife are too high.	Fife is a source of both housing need and demand. The Fife requirement was based on the assessment of constraints, capacities and opportunities as well as site capacity and identification work been undertaken for the Fife LDP.	Not required in this instance
Y2	179, 185, 191, 197, 470, 180, 262	The Ore / Upper Leven Valley is not deliverable and should be deleted or reduced to not more than 1,220 units and the remainder added to the Outwith SDA allowance.	This would not be in accordance with the Spatial Strategy set out in the approved SDP. This is based on a long term regeneration strategy and not short term delivery issues.	Not required in this instance
Y3	273, 597, 153, 396, 354, 347, 335	Aberdour cannot accommodate more development without detrimental impacts to its character and infrastructure as well as increased traffic congestion.	The detail of individual sites within Fife is a matter for the Fife LDP.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
Y4	521, 534, 523, 536	Recommend the addition of a new SDA - The Fife Bridgehead. This would include towns such as Limekilns, Rosyth, North Queensferry, Inverkeithing and Dalgety Bay and include an allocation of 2,170 homes. This would be made up of 950 deducted from the Outwith SDAs Allowance and 1,220 deducted from the Ore / Upper Leven Valley SDA.	The Supplementary Guidance cannot identify additional SDAs. The approved spatial strategy is set out in the approved SDP. Development of the Ore/Upper Leven Valley based on a long term regeneration strategy.	Not required in this instance
Y5	184, 190, 196	A greater proportion of Edinburgh's need and demand should be directed to Fife.	This would not be considered sustainable.	Not required in this instance
Y6	366, 372, 392	The Outwith SDA allowance should be deleted.	It is in accordance with the approved SDP and is based on a capacity, opportunity and constraints assessment. The level of allowance will be reviewed during LDP preparation.	Not required in this instance
Y7	186, 192, 198	A significant proportion if not all of the additional 3,220 units proposed within the Ore / Upper Leven Valley should be for sites outwith SDAs.	This would not be in accordance with the Spatial Strategy set out in the Approved SDP. Development of the Ore/Upper Leven Valley based on a long term regeneration strategy.	Not required in this instance
Y8	354, 347	Lower the Fife requirement outside SDAs.	The allowance will be reviewed during LDP preparation in accordance with the SDP.	Not required in this instance
Y9	12, 37	Question delivery in Dunfermline.	This is based on the delivery of an approved strategy.	Not required in this instance
Y10	97	The figures for Fife have been artificially inflated by using the GRO estimates which are not based on reality and by accommodating Edinburgh's need and demand.	The Housing Need and Demand Assessment figures were considered as robust and credible by the Scottish Government.	Not required in this instance
Y11	98	It is for Fife to determine the breakdown by SDA in a manner that's open to public scrutiny.	The allowances will be reviewed during LDP preparation. The sites within SDAs is a matter for the Fife LDP.	Not required in this instance
Y12	262	A reduced allowance within the North Dunfermline SDA should be made due to deliverability concerns within the pre 2019 period.	The allowances will be reviewed during LDP preparation.	Not required in this instance
Y13	375	Fife will provide 43% of housing development outwith SDAs. This is extremely high. Query whether this is justified or proportionate.	The level of allowances will be reviewed during LDP preparation. The identification of areas outwith SDAs contributing towards meeting the housing requirements is in accords with the approved SDP.	Not required in this instance
Y14	548	Question whether Fife will be able to deliver.	The SDP and Supplementary Guidance focuses on delivering a long term strategy. The Housing Need and Demand Assessment indicates that there is a high level of housing need in Fife.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
Y15	36	There are other areas closer to the M90 that haven't been considered e.g. Kelty, Kinross and Southern Dunfermline. The North Dunfermline SDA is overtly biased to one area of Dunfermline.	The detail of individual sites within Fife is a matter for the Fife LDP.	Not required in this instance
Y16	471	Agrees with the identification of 1,950 units outwith SDAs provided this is justified in the HNDA. It will be important these are allocated on the right sites that are effective and deliverable.	The allowance will be reviewed during LDP preparation.	Not required in this instance
Y17	17, 18	Strategic villages such as Crossford to the west of Dunfermline could accommodate significant growth with no impact on the proposed green belt for Dunfermline. The Supplementray Guidance should specifically identify the Dunfermline Western Villages as a strategic location.	The spatial strategy is set out in the approved SDP. The supplementary Guidance cannot identify further SDAs. The detail of individual sites within Fife is a matter for the Fife LDP.	Not required in this instance
Y18	38	Vacant property and land in Dunfermline Town Centre should be developed.	The detail of individual sites within Fife is a matter for the Fife LDP.	Not required in this instance
Y19	280	Coastal villages should not be identified for new development.	Coastal Fife is not identified as part of a Strategic Development Area. The detail of individual sites within Fife is a matter for the Fife LDP.	Not required in this instance
Y20	594	Support for Fife Council's continued position on Dunfermline's expansion to the West, North and North West.	Noted.	Not required in this instance
<b>Z - Midlothian</b>				
Z1	130, 184, 190, 196, 261, 408, 93	The figures for Midlothian are too high.	The requirement for Midlothian is based on the continued delivery of an existing and approved long term delivery strategy. A strategic amount of Midlothian's requirement will be met within South East Edinburgh.	Not required in this instance
Z2	572	The additional allowances in the A7 / A68 / Borders Rail Corridor should be increased.	This level of development is considered appropriate. Further development in Midlothian at this time could not be accommodated and would impact on the delivery of the proposed strategy.	Not required in this instance
Z3	251, 316, 315	The A701 Corridor could accommodate far more development.	This level of development is considered appropriate. Further development in Midlothian at this time could not be accommodated and would impact on the delivery of the proposed strategy.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
Z4	317	Additional Allowances Outwith SDAs should be directed to the SDAs, in particular the A701 Corridor.	This level of development is considered appropriate. Further development in Midlothian at this time could not be accommodated and would impact on the delivery of the proposed strategy.	Not required in this instance
Z5	598	To much redistribution from CEC to MLC	A significant proportion of Midlothian's requirement will be delivered in the South East Edinburgh SDA. These sites will be accessible to employment and other major generators of travel within Edinburgh and Midlothian. This strategy is set out in the approved SDP and is recognised in NPF3.	Not required in this instance
Z6	212	Requirement not deliverable.	The requirement for Midlothian is based on the continued delivery of an existing and approved long term delivery strategy.	Not required in this instance
Z7	92	More thought required on transport in Midlothian to accommodate development.	Further work on cumulative transport impacts and mitigations is underway.	Not required in this instance
Z8	93	The number of houses allocated to Bilston is inappropriate.	The detail of individual sites within Midlothian is a matter for the Midlothian LDP.	Not required in this instance
Z9	318	Allowances within the A701 corridor are deliverable.	Acknowledged.	Not required in this instance
<b>AA - Scottish Borders</b>				
AA1	184, 190, 196, 261, 315, 533, 499, 544, 545	The Scottish Borders figures are too high/in excess of need and won't be delivered	Housing demand in the Scottish Borders will increase with the opening of the Borders railway allowing sustainable travel to Midlothian and Edinburgh. The Scottish Borders housing requirement reflects a long term strategy.	Not required in this instance
AA2	35, 338, 467, 473	Scottish Borders appears to be under distributed, especially with the new rail link.	Housing will be delivered in the Scottish Borders to build on the opportunities created by the Scottish Borders Railway.	Not required in this instance
AA3	530, 541, 598	It is flawed to rely on the Scottish Borders to such an extent.	The strategy does not 'rely' on the Scottish Borders. Only 12% of the overall SESplan housing requirement is allocated to the Scottish Borders.	Not required in this instance
AA4	84, 85	There should be a greater allocation in the Eastern Borders associated with a new station at or near Reston.	Although Reston Station has not yet been confirmed, there is a significant allocation of housing land with the Scottish Borders LDP.	Not required in this instance
AA5	230	The scale of new housing development in the Eastern Borders SDA should take into account Berwick-Upon-Tweed's local 'strategic' role. 900 additional houses are proposed in Berwick over the period to 2031.	The role and location of Berwick-upon-Tweed was recognised in the creation of the SESplan spatial strategy.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
AA6	607	The increased housing requirements affecting Peebles are excessive.	In the Supplementary Guidance the Western Borders SDA has an additional allowance of 110 units. The location within this SDA is a matter for the Scottish Borders LDP.	Not required in this instance
<b>AB - West Lothian</b>				
AB1	274, 212, 213, 586, 587	West Lothian could accommodate more housing.	The housing requirement for West Lothian is based on a balance of considerations, studies and analysis. This level of development is considered appropriate. Further development in West Lothian beyond current SDP requirements set out in the supplementary guidance could not be accommodated at this time and would impact on the delivery of the proposed strategy. It will be for the West Lothian LDP to determine the location of development to meet the requirements of the SDP.	Not required in this instance
AB2	32, 113, 130, 558, 33	The figures for West Lothian are too high.	The housing requirement for West Lothian is based on a balance of considerations, studies and analysis.	Not required in this instance
AB3	11, 22, 24, 23, 214	Winchburgh is a sustainable location and has capacity to accommodate more development.	Subject to the delivery of the rail station, the sustainability of Winchburgh is recognised. Details of sites within the West Lothian SDA is a matter for the West Lothian LDP.	Not required in this instance
AB4	552	There is a requirement for expansion in the Edinburgh / West Lothian corridor alongside public transport links.	The delivery of West Edinburgh and new development at Broxburn and Winchburgh is based around this strategy.	Not required in this instance
AB5	588	Despite the corridor through West Edinburgh into West Lothian being a primary economic driver for the region, the requirement assessed for West Lothian appears to be very conservative.	The requirement for West Lothian will require housing delivery that is in excess of achieved delivery rates seen in the 21st century. A significant level of this development will be delivered in eastern West Lothian.	Not required in this instance
AB6	209	It is not accepted that there are infrastructure constraints in West Lothian sufficient to downgrade its importance. Infrastructure is being provided in Winchburgh.	Winchburgh will contribute to meeting West Lothian's housing requirement. The detail of this is a matter for the West Lothian LDP. Constraints in West Lothian are set out in the appendices of the Technical Note.	Not required in this instance
AB7	558	The proportion of housing required from West Lothian is not supported by the availability of infrastructure.	A review of infrastructure constraints in West Lothian was undertaken during the preparation of this Supplementary Guidance. A full analysis of the requirements and a delivery strategy, including infrastructure provision, will be set out in the West Lothian LDP and its accompanying Action Programme.	Not required in this instance

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
AB8	591	Development in west West Lothian is less deliverable	Detail of the individual sites within the West Lothian SDA is a matter for the West Lothian LDP.	Not required in this instance
AB9	563	Delivery of existing sites in West Lothian is unlikely within the plan period.	The delivery of existing sites will be reviewed in the preparation of the West Lothian LDP. The Supplementary Guidance is informed by Housing Land Audit 2012 agreed with the housebuilding industry and advises on proposed phasing of sites.	Not required in this instance
AB10	213	Review West Lothian infrastructure difficulties and promotes additional land release at Winchburgh.	A review of infrastructure constraints in West Lothian was undertaken during the preparation of this Supplementary Guidance. A full analysis of the requirements and a delivery strategy will be set out in the West Lothian LDP and its accompanying Action Programme. Detail of the individual sites within the West Lothian SDA is a matter for the West Lothian LDP.	Not required in this instance
AB11	589	Do not agree that West Lothian is in any way self contained. Concerned that sufficient housing to supply the Cross Plan requirement created by the Gyle, Airport, Newbridge, Livingston employment corridor has not been adequately addressed.	The requirement for West Lothian will require housing delivery that is in excess of achieved delivery rates seen in the 21st century. It will be for the West Lothian LDP to identify the sites for future development and infrastructure requirements to support development.	Not required in this instance

## Summary of Main Issues (Other)

The full responses are available to view and download at -

<http://sesplan-consult.objective.co.uk/portal/sg/hsgland>

Issue ID	Response ID	Summary	SDPA Response	SDPA Proposed Modification
<b>AC - No Further Comment</b>				
AC1	254	Question 3 - Nothing to add. See response 253.	No response required.	Not required in this instance
AC2	515	Question 3 - No specific opinion.	No response required.	Not required in this instance
AC3	255	Question 4 - Nothin to add. See response 253.	No response required.	Not required in this instance
AC4	554	Question 4 - No response.	No response required.	Not required in this instance
<b>AD - Duplicate Response</b>				
AD1	410	Duplicate response. See response 408.	No response required.	Not required in this instance
AD2	491	Duplicate response. See response 490.	No response required.	Not required in this instance



**APPENDIX C** Proposed Editorial Changes to the draft Supplementary Guidance on  
Housing Land

## Supplementary Guidance Housing Land – Proposed Editorial Changes

**Table A – Supplementary Guidance Proposed Editorial Changes**

Paragraph / Table Number	Existing Text	Proposed Editorial Change	Reason for Editorial Changes
2.2	“...a significant proportion of housing need and demand generated in the City of Edinburgh may need to be met in the other five LDP areas.”	“...a significant proportion of housing need and demand generated in the City of Edinburgh <del>may</del> <b>will</b> need to be met in the other five LDP areas.”	Removes uncertainty and is consistent with paragraph 110 of the SDP.
Table 3.2		Insert total row	Clarification of the scale of the additional allowances.
3.5	Replace paragraph	The distribution of the overall housing land requirement by LDP area builds on, and complements, existing committed development in accordance with the approved Spatial Strategy of the SDP. Capacity for development, that can be accommodated sustainably, has been identified where need arises and demand is found. This has had to take account of the analysis of the opportunities, constraints and capacities. This identified that there is insufficient sustainable capacity within the City of Edinburgh boundaries to meet a significant proportion of the demand for housing that arises there. Therefore, the shortfall has had to be made up in the other five LDP areas. This has either been located in areas closest to Edinburgh (e.g. Midlothian will deliver 4,000 units in the South East Edinburgh SDA) or to build on sustainable development opportunities, such as the opening of the Borders Railway. Full detail on how all the factors were considered in the Supplementary Guidance preparation process are set out in the accompanying Technical Note.	Additional reasoning and justification for the housing requirements set out in Table 3.1
3.11	In all circumstances, the principles and criteria set out within Policies 1B (Spatial Strategy Development Principles), 6 (Housing Land Flexibility) and 7 (Maintaining a Five Year Housing Land Supply) must be adhered to and met by each of the six LDPs.	In all circumstances, the principles and criteria set out within Policies 1B (Spatial Strategy Development Principles) and 6 (Housing Land Flexibility) must be adhered to and met by each of the six LDPs. Policy 7 (Maintaining a Five Year Housing Land Supply) enables LDPs to allocate sites outwith Strategic Development Areas, subject to satisfying the policy criteria.	Clarity in the Supplementary Guidance Document of the role of land outwith SDAs.

**Table B – Supplementary Guidance Technical Note Proposed Editorial Changes**

Paragraph / Table Number	Existing Text	Proposed Editorial Change	Reason for Editorial Change
Table 3.2		Remove footnote from table 3.2	Included as part of re-assessed land supply.
4.16	A step change in the level of housing completions by house builders will be required to deliver the HNDA requirement over the period 2009 - 2024.	A step change in the level of housing completions by house builders will be required to deliver the housing requirement over the period 2009 – 2024 (average of 7,180 dwellings per annum).	Additional text to give in context of the scale in increase of housing deliver required.
5.10	Following the refresh of the Spatial Strategy Assessment, each member authority determined that the total additional allowances (the phasing may have been amended).....	Following the refresh of the Spatial Strategy Assessment, each member authority determined that the <b>capacity that made up the total</b> additional allowances (the phasing may have been amended)....	Clarification that it was the capacity that was re-assessed.
5.13 Point 2	Additional text after “development sustainably.”	This is accordance with SDP paragraphs 113 and 116.	For clarification that the adopted SDP allows for LDPs to allocate land outwith SDAs.
5.14	Additional text at the end of the paragraph	Following the summary of the process for each LDP Area, a table shows the additional development capacity over the Established Land Supply. This includes the additional allowances previously set out in the Proposed SDP.	Clarifiaction of the process undertaken.
Table 5.3 Title	Additional Allowances in the City of Edinburgh	Additional Development Capacity in the City of Edinburgh	Correct definition of table
Table 5.4 Title	Additional Allowances in the East Lothian	Additional Development Capacity in East Lothian	Correct definition of table
Table 5.5 Title	Additional Allowances in the Fife	Additional Development Capacity in Fife	Correct definition of table
Table 5.6 Title	Additional Allowances in the Midlothian	Additional Development Capacity in Midlothian	Correct definition of table
Table 5.7 Title	Additional Allowances in the Scottish Borders	Additional Development Capacity in the Scottish Borders	Correct definition of table
Table 5.3 Title	Additional Allowances in the West Lothian	Additional Development Capacity in West Lothian	Correct definition of table
Paragraph 6.4	On the basis of the considerations above, Table 6.2 below sets out that the distribution of additional allowances by SDA to meet the shortfall of 24,338 units over the period to 2024.	On the basis of the considerations above, <b>and the capacity analysis undertaken in section 5</b> , Table 6.2 below sets out the distribution of additional allowances by SDA to meet the shortfall of 24,338 units over the period to 2024.	Clarification

Paragraph / Table Number	Existing Text	Proposed Editorial Change	Reason for Editorial Change
New Paragraph after 6.5		Firstly, the distribution of the Housing Land Requirement must be in accordance with the SESplan Spatial Strategy set out in the approved SDP. It builds on existing committed development, focussing further development along preferred corridors optimising connectivity and access to services and jobs.	Based on the content of some consultation responses, there is a need to remind that the Supplementary Guidance must accord with the approved spatial strategy.
Paragraph 6.8	In this context, it is proposed that requirements are set for each LDP which ensure that need and demand are met as far as practical in areas close to where that arises, taking into account the analyses outlined in section 6.	In this context, it is proposed that requirements are set for each LDP which ensure that need and demand are met as far as practical in areas close to where that arises, taking into account the analyses outlined in section 6 <b>5</b> .	Correction
Table 8.17	Recommended as Preferred Location for Development in Original Assessment - NO	Recommended as Preferred Location for Development in Original Assessment - <b>YES</b>	Correction
Table 8.19	Recommended as Preferred Location for Development in Original Assessment - NO	Recommended as Preferred Location for Development in Original Assessment - <b>YES</b>	Correction

**APPENDIX D**

Strategic Environmental Assessment Environmental Report

**SESplan Housing Supplementary Guidance**

**Strategic Environmental Assessment: Updated Environmental  
Report**

**February 2014**

**Contents**

Non-technical summary_____	3-6
1. Introduction	7-8
- Key Facts_____	7
- Consultation Authority comments_____	8
2. Planning context of the Housing Supplementary Guidance	9
- Relationship with other Plans, Policies and Strategies_____	9
3. Relevant aspects of the current state of the environment	10
- Baseline_____	11
- Likely evolution of the environment without the document_____	11
- Environmental objectives of the SEA_____	12-15
4. Assessment of environmental effects	16-20
- Alternatives_____	16
- Assessment findings_____	16-20
5. Measures to prevent/reduce/offset significant adverse effects_____	21-22
6. Monitoring_____	23
7. Next steps_____	23

### **Appendices**

<i>Appendix 1: Consultation Authority Comments</i> _____	24-27
<i>Appendix 2: Relevant Plans, Programmes and Strategies</i> _____	28-52
<i>Appendix 3: Detailed Assessments</i> _____	53-70
<i>Appendix 4: Battlefields (Addition to baseline)</i> _____	71

### **Annex 1**

Updated Environmental Report on SESplan Proposed Plan	
- Baseline_____	76-119

## **Non-technical Summary**

### **Background**

#### ***Objectives***

- The Environmental Report contains an assessment of the additional and re-phased housing allocations that have been put forward in the SESplan Housing Supplementary Guidance (SG). This is the only objective of the document, as the SESplan strategic development plan has already been subject to the SEA process.
- The original SESplan SEA, which covers the same area in question in this SEA, contains a detailed environmental assessment that was considered useful to inform this SEA on the SG. In addition a background document that was undertaken separately, the Updated Spatial Strategy Assessment, also informs the assessment as elements of this work affect certain SEA topics.

#### ***Contents***

- The Environmental Report contains:
  - o Key facts on the document
  - o Summary of the Consultation Authority comments on the Screening/Scoping statement
  - o Discussion of the relationship of the SG on relevant plans, policies and strategies (PPS)
  - o Discussion of relevant aspects of the Environment
  - o Assessment of the environmental effects of the SG and consideration of measures to prevent, reduce and offset these effects
  - o Consideration of monitoring
  - o Consideration of the next steps
- In addition to the contents above, an annex is contained which is the SESplan Updated Environmental Report. Importantly this document contains the baseline that was used.

#### ***Relationship with other PPS***

- The table that was used for the SESplan SEA was updated for the SG as it was found a number of PPS had changed and that the more narrow scope of this document meant some PPS were not relevant.
- The findings resulted in useful indicators from respective PPS and these were used to establish SEA objectives.

### **Current state of the Environment and the evolution thereof without implementation of the plan or programme**

#### ***Baseline***

- The baseline from the original SESplan was used to inform this Environmental Report on the SG, with support from the Consultation Authorities



- The baseline was a comprehensive representation on the respective elements of the SESplan environment that could be affected by the SG. It was split by relevant SEA topics.

***Likely evolution of the environment without the Housing Supplementary Guidance***

- It was considered that at a basic level additional housing numbers brought a negative impact on the environment of the area when compared to no additional housing numbers.
- However there were also benefits to be expected particularly for the population of the SESplan area through a greater choice of affordable housing, type of housing and access to additional open space

***Environmental characteristics of areas likely to be significantly affected***

- It was considered the baseline contained in the Annex provided this information

***Existing environmental problems which are relevant to the plan or programme***

- The baseline and relevant PPS, as well as the original SESplan Environmental Report and the Updated SSA confirmed that air quality, increased emissions, development on greenfield land, impact on cultural heritage, soil sealing, access to sustainable transport and flood risk were all potential environmental problems within the SESplan area that could be created or exacerbated by the Housing SG

***Environmental protection objectives, established at international, community or member state level***

- As stated above, the assessment of the relevant PPS resulted in indicators that were used to inform SEA objectives. Some of these indicators resulted from international legislation i.e. legislation on European Sites and priority species.

**Likely Significant Effects of the SG on the environment**

- The assessment of each member Local Authority area by SEA topic resulted in a range of findings, from minor negative impacts, neutral impacts, positive impacts and significantly positive impacts
  - o Air- it was found there may be negative effects in certain Local Authority areas due to increased traffic volumes which would have an adverse effect on air quality
  - o Climatic Factors- it was found there may be negative effects as a result of construction and from increased traffic volumes, due to increased emissions
  - o Population and Human Health- it was found there were positive impacts due to close proximity to sustainable transport links, greater

choice of types of housing, increased numbers of affordable housing and the potential for regeneration

- Soil- it was found there would be negative effects due to development of greenfield and prime agricultural land which could lead to soil sealing.
- The above effects were generally considered to be short through to long term, as the first phase of the additional allocations was 2009-2019, then impacts could begin to be experienced as soon as allocations began to be developed;
- It was thought the effects would be a mix of temporary and permanent. Construction emissions were considered to be temporary, whereas soil sealing could be permanent;
- Secondary effects were identified on the Climatic Factors and Water SEA topics, this resulted from rises in car usage exacerbating CO<sub>2</sub> emissions and soil sealing from development of greenfield land exacerbating flood risk.
- Cumulative effects were identified on the Air and Soil SEA topics. For Air this related to a cumulative negative impact on air quality in specific locations in the SESplan area, routes into and surrounding Edinburgh were considered to be at particular risk. For Soil it was assessed that the development of additional allocations on greenfield land might result in an overall negative effect on soil quality in the SESplan area.
- Synergistic effects- One such effect was identified on the Population & Human Health SEA topic; it was found that the combination of air pollution and rise of CO<sub>2</sub> emissions could have an impact on human health issues.

**Measures to prevent, reduce & as fully as possible offset any significant adverse effects on the environment of implementing the plan**

- Measures to tackle the possible adverse effects identified above were identified:
  - For Air the assessments were either neutral or minor negative. The assessment centred on increased emissions from both increased number of motorised journeys and construction. It was decided that some local authorities have the public and sustainable transport links to be able to significantly mitigate emissions from motorised journeys, whereas other local authorities do not. However continued development of better public and sustainable transport links, including the CSGN, and encouragement of modal shift will make an impact across the SESPlan area.
  - For Climatic Factors the assessment mainly concluded that the effects were unknown. It could be established that development would avoid coastlines, and therefore associated impacts. However with requirements being located out of SDAs, and with limited brownfield land available, effects associated with development on greenfield land, such as soil erosion and soil sealing are possible. Work will be required at LDP level to allocate the requirement to the most appropriate land and to provide effective mitigation of issues identified.

- For Cultural Heritage the results of the assessment were mainly unknown, this was because of the large number of cultural heritage assets in the respective local authority areas or their SDAs. It could be established that impacts were almost certain but it could not be asserted whether they would be negative or positive. It was considered that a design-led approach, particularly to promote “distinctive” places could help mitigate any adverse effects by considering the cultural heritage asset from an early stage.
- For the Landscape and Townscape SEA topic it was judged that the Updated SSA would generally help to ensure no negative effects on landscape designations, although a minor negative effect is expected in the West Edinburgh SDA. In addition to this, it was considered that the promotion of additional allocations at a LDP level should be through a ‘design-led’ approach to help ensure the creation of successful places; by doing this it is considered the setting and character of the respective towns and landscapes would be taken account of.
- For the Soil SEA topic it was judged that at a LDP level brownfield sites should be primarily considered for allocations where possible, although it is found that this is not possible in certain local authority areas. In addition, measures to reduce the impact of soil sealing and soil erosion should be considered wherever possible, such as permeable surfaces, SUDs design and green infrastructure. The loss of prime agricultural land will require monitoring to avoid impacts associated with climate change and food security in future years.

**Description of the measures envisaged concerning monitoring in accordance with section 19**

- It is stated that the SG is essentially an extension of the SESplan document and that it is unclear whether there would be another document of this type or whether the document will be superseded by SESplan Strategic Development Plan (SDP) 2.
- As a result the most effective way to monitor the effects identified in this document is considered to be to ‘piggy-back’ on the Monitoring Report for SESplan and ensure that in the future these issues are built into the next SEA that is undertaken for SESplan SDP 2 or are built into the SDP 2 itself.

## **1. Introduction**

1.1 The purpose of this Environmental Report is to:

- provide information on the SESplan Housing Supplementary Guidance
- identify, describe and evaluate the likely significant effects of the SG and its reasonable alternatives (if any are identified)
- provide an effective opportunity for further comment from the Consultation Authorities, and for the public to offer any views on any aspect of this Environmental Report.

1.2 The key facts relating to the SESplan Housing Supplementary Guidance are set out in Table 1 below:

<b>Name of Responsible Authority</b>	<b>SESplan</b>
Title	SESplan Housing Supplementary Guidance
What prompted the document?	Scottish Ministers
Subject	Land use planning/housing
Period covered by the document	2009-2024
Frequency of updates	The document will be superceded by SESplan SDP 2
Area covered by the document	The entire SESplan area; covers entire Local Authority areas of City of Edinburgh, East Lothian, Midlothian, Scottish Borders and West Lothian, and the southern part of Fife, including the settlements Glenrothes, Dunfermline & Kirkcaldy
Purpose of the document	The SG sets out how much of the overall housing land requirement should be met in each of the 6 member authority areas for the period 2009-2024. In addition to this it also presents a revised phasing of the intended implementation of these housing figures.
Contact Point	Philip.graham@scotborders.gov.uk

1.3 This Environmental Report refers to work that was undertaken in the SEA for SESplan, as a result Table 2, below, shows the previous SEA milestones that have been reached. Alongside this information the stage that SESplan and the subsequent supplementary guidance have reached are also included, this is because the SG is additional guidance which hangs off the approved SESplan SDP1. The requirement for the SG arose out of the examination of SDP 1.

*Table 2 Milestones of SESplan and associated SEA*

	<i>SESplan</i>	<i>SEA</i>
TIME ↓		Main Issues Report (MIR): Scoping Report
	MIR	MIR Environmental Report
	Proposed Plan	Addendum to Environmental Report
	<b>Examination and subsequent Reporter's recommendations accepted by Scottish Ministers</b>	
	SESplan SDP 1 Adoption Statement	
		Draft SESplan SG on Housing: Screening and Scoping Report
	<b>Consultation Authority comments</b>	
	Draft SESplan SG on Housing	Environmental Report
	Consultation	Consultation
	Approval	
		Post Adoption Statement

### Consultation Authority Comments

- 1.4 A Screening/Scoping report was prepared which set out the proposed content of the Environmental Report and the proposed methodology for the completion of the environmental assessment in the Environmental Report. This report was sent to the Consultation Authorities via the SEA Gateway on 13 August 2013 and 3 responses (Historic Scotland, SEPA, SNH) were received on 10 September 2013.
- 1.5 Where appropriate the responses have been used to inform this Environmental Report. Appendix 1 below contains a matrix which summarises the representation received and provides a response, which details the action that was taken as a result.

## **2 Planning Context of the Housing Supplementary Guidance**

### **Outline & objectives of Draft Housing Supplementary Guidance**

- 2.1 The purpose of the SG is to provide detailed further information in support of SDP Policy 5 (Housing Land). The further information will provide direction for Local Development Plans (LDPs) as to how much of the overall housing land requirement should be met in each of the six member authority areas (City of Edinburgh, East Lothian, Fife, Midlothian, Scottish Borders and West Lothian)
- 2.2 The document will essentially act as an addition to the SESplan document and, as part of the hierarchy of development planning; Local Development Plans for SESplan member authorities will be required to take cognisance of the findings.
- 2.3 As a result, the document is relatively short, as it only has to present one key objective. However there is a Technical Note which shows how the findings that are presented were concluded. As a part of this Technical Note there is an update to a Spatial Strategy Assessment (SSA) which was undertaken for the original SESplan.
- 2.4 The original SSA was undertaken to help decide upon Strategic Development Areas (SDA); these areas were allocated through an assessment of a number of criteria with the overall aim to try to find the most sustainable locations for prospective housing allocations in the respective Local Authority areas. The first stage of the assessment process was to sieve out areas not suitable for strategic development taking account of national and international environmental designations and accessibility analysis. The remaining land was divided into 30 sub-areas which were assessed against a range of criteria including environmental considerations.
- 2.5 The update to the SSA follows a similar methodology. In effect the SSA complements the Environmental Report, in explaining the environmental effects of the preferred housing areas across the respective Local Authorities and the areas deemed non-preferable. The Environmental Report then adds detailed environmental assessment of these areas against the SEA criteria detailed in the Environmental Assessment Act.

### **Relationship with other Plans, Programmes & Strategies (PPS)**

- 2.6 Appendix 2 contains a table which lists PPS and a summary of their content; these are split by SEA topic. These PPS are considered to have relevant detail which the SG should take cognisance of. A further column is provided which shows the SEA topics that are affected, as it is found that certain PPS affect more than one SEA topic.
- 2.7 By identifying these PPS and their relevant content, indicators to protect the SESplan environment, including its residents, is established and this can be used in the detailed assessment of the content of the SG. It is considered that some of the indicators are more important than others, or one indicator may cover a number of separate issues (i.e. protection of natural heritage assets can include key habitats and species and forestry), therefore further work is done in Table 3 below, to refine these indicators to help streamline the assessment:

Table 3: Indicators from respective SEA Topics for the detailed assessment	
Air	<ul style="list-style-type: none"> <li>• Do not exacerbate or create new Air Quality Management Areas</li> <li>• Aim to allocate housing land accessible to sustainable and public transport</li> </ul>
Biodiversity, flora & fauna	<ul style="list-style-type: none"> <li>• Avoid allocating land where the natural heritage assets of the SESplan area may be adversely affected</li> </ul>
Climatic Factors	<ul style="list-style-type: none"> <li>• Consider the potential for climate change mitigation and adaptation in the allocation of housing land</li> </ul>
Cultural Heritage	<ul style="list-style-type: none"> <li>• Avoid adverse impacts on the site and setting of historic environment assets within the SESplan area</li> </ul>
Landscape & Townscape	<ul style="list-style-type: none"> <li>• Ensure allocations 'fit' within the landscape by following national design guidance</li> <li>• Avoid adverse impacts on the designated landscapes of the SESplan area</li> </ul>
Water	<ul style="list-style-type: none"> <li>• Avoid creation and exacerbation of flood risk in the allocation of housing land</li> <li>• Avoid adverse impacts on water bodies from the allocation of housing land</li> </ul>
Population and Human Health	<ul style="list-style-type: none"> <li>• Aim to ensure housing land is accessible to usable open space, and sustainable transport routes, including integrating with the CSGN and Borders Green Network</li> </ul>
Material Assets	<ul style="list-style-type: none"> <li>• Ensure allocations are accessible to waste management facilities</li> <li>• Consider the potential for renewable energy and heat generation in the allocation of housing land</li> </ul>
Soil	<ul style="list-style-type: none"> <li>• Adhere to contaminated land regulations in the allocation of housing land</li> <li>• Aim to avoid soil erosion and soil sealing where allocations are located</li> </ul>

### **3 Relevant aspects of the current state of the environment**

#### **Environmental baseline data**

3.1 The SESplan SEA was undertaken using a comprehensive baseline which was then updated at the end of 2011 for the Updated Environmental Report. Table 4 below shows the environmental information that was used to form this baseline:

<b>SEA Topic</b>	<b>Corresponding spatial information</b>
Air	Air quality and average daily vehicle flows
Biodiversity	Special Areas of Conservation, Special Protection Areas, Ramsar sites, Sites of Special Scientific Interest and Ancient Woodland Inventory
Climatic Factors	Flooding, air quality, wind turbines & CO <sub>2</sub> emissions
Cultural heritage	Scheduled Ancient Monuments, Listed Buildings, World Heritage Sites and Gardens & Designed Landscapes Inventory
Landscape	National Scenic Areas, Areas of Great Landscape Value and Country Parks
Material assets	Current land use
Population & Human Heath	Green network, key transport routes (road & rail), Core Paths, Urban Areas and SUStran routes
Soil	Vacant & Derelict Land Survey
Water	SEPA flooding data

3.2 It is considered that given the SG applies to the entire SESplan area and it was compiled relatively recently that it can be re-used for this Environmental Report. An addition is made to incorporate the recently designated battlefield sites located within the SESplan area.

3.3 The baseline is presented at Annex 1; it consists of text based evidence backed by relevant spatial maps, which are split by SEA topic.

#### **Likely Evolution of the Environment without the Housing Supplementary Guidance**

3.4 The SESplan SEA states that SESplan has a statutory obligation to set a vision for the South East Scotland area, to consider development alongside other issues such as the principal social, economic, physical and environmental characteristics of the area and infrastructure provision and use and address the



strategic and cross boundary planning issues in South East Scotland. In addition SESplan must contribute to sustainable development.

- 3.5 The SG has a revised phasing of housing requirement to that included in the Proposed Plan for SDP1. Therefore, the impacts on the environment of the Supplementary Guidance in comparison with the housing distribution set out in the Proposed Plan are likely to be increased. The development of a revised phasing of housing will lead to additional environmental impacts in comparison to those set out in the Environmental Report for SDP1.

### **Environmental Objectives of SEA**

- 3.6 The SESplan SEA uses the findings of the current state of the environment to articulate a number of SEA objectives and sub-objectives which form a basis against which assessment of the SESplan proposals can occur.
- 3.7 It is considered that these objectives and sub-objectives are also relevant to a degree for this Environmental Report's assessment of the SG. However it is also pertinent to look at the information the revised relationships from the PPS provides to establish if there should be any change. In addition, it is also necessary to decide on whether the SEA objectives previously identified are still appropriate given the context of the SG.
- 3.8 An indication is also provided of what monitoring is appropriate for each SEA objective identified, where this is known.
- 3.9 As a result the following SEA objectives and monitoring measures are decided upon, shown in Table 5:

Table 5 SEA Objectives			
SEA Objective	SEA Topic	Sub-objectives	Monitoring
To sustain current air quality levels	Air	<ul style="list-style-type: none"> <li>• Maintain current levels of air quality</li> <li>• Provide greater opportunities for access to sustainable forms of transport</li> </ul>	<ul style="list-style-type: none"> <li>• Current air quality</li> <li>• Average daily vehicle flows</li> <li>• SEStran mode share targets and region wide measures (environmentally sustainable measures)</li> </ul>
To avoid adverse effects on natural heritage assets of the SESplan area as a result of the location of additional or re-phased allocations	Biodiversity	<ul style="list-style-type: none"> <li>• Protect international conservation areas</li> <li>• Protect national/local conservation areas</li> <li>• Protect ancient woodland</li> <li>• Protect/enhance the Green Network.</li> </ul>	<ul style="list-style-type: none"> <li>• Ancient woodland extent</li> <li>• Forest cover as stated in the Native Woodland Survey of Scotland</li> <li>• CSGN work plan, Milestones to 2016 'A place for Nature'</li> <li>• Local biodiversity and geodiversity site (LBS and LGS) monitoring</li> <li>• Monitoring of developments involving woodland loss</li> </ul>
To minimise CO <sub>2</sub> emissions as a result of location of additional or re-phased allocations	Climatic Factors	<ul style="list-style-type: none"> <li>• Promote development in areas accessible by public transport</li> <li>• Promote the potential for renewable energy and heat generation from areas allocated for housing</li> </ul>	<ul style="list-style-type: none"> <li>• Current CO<sub>2</sub> emissions for domestic gas &amp; electricity</li> <li>• Current CO<sub>2</sub> emissions for transport</li> <li>• National renewable energy targets</li> <li>• SEStran mode share targets and region wide measures (environmentally sustainable measures)</li> </ul>
To safeguard the built and historic environment from impacts as a result of additional or re-phased allocations	Cultural heritage	<ul style="list-style-type: none"> <li>• Protect listed buildings</li> <li>• Protect scheduled monuments</li> <li>• Protect world heritage site</li> <li>• Protect designed gardens &amp; landscapes</li> </ul>	<ul style="list-style-type: none"> <li>• Number and outcome of planning applications with significant effects on - listed buildings; scheduled monuments; world heritage sites; designed gardens and landscapes; and buildings at risk</li> </ul>

To protect the landscape and townscape within the SESPlan area from impacts as a result of additional or re-phased allocations.	Landscape & Townscape	<ul style="list-style-type: none"> <li>• Protect designated sites</li> <li>• Protect settlement townscapes</li> </ul>	<ul style="list-style-type: none"> <li>• Local Authority landscape review documents</li> <li>• Local Authority conservation area statements</li> </ul>
To ensure sustainable location of additional or re-phased allocations regarding necessary infrastructure	Material assets	<ul style="list-style-type: none"> <li>• Sustainable use of mineral resources</li> <li>• Recycling of waste</li> </ul>	<ul style="list-style-type: none"> <li>• Current mineral resources available</li> <li>• % of waste recycled</li> </ul>
To improve the quality of life and human health for communities in the SESplan area	Population & Human Health	<ul style="list-style-type: none"> <li>• Provide access to employment</li> <li>• Provide affordable housing</li> <li>• Improve access to services</li> <li>• Provide access to greenspace</li> <li>• Access to footpaths &amp; cycle routes</li> </ul>	<ul style="list-style-type: none"> <li>• Employment statistics/employment sites data</li> <li>• Public transport provision &amp; cycle networks</li> <li>• % of affordable housing available</li> <li>• Accessibility to services</li> <li>• Accessibility to designated green network and/or open space</li> </ul>
To minimise the impact on soil quality from impacts as a result of additional or re-phased allocations, and to adhere to contaminated land regulations	Soil	<ul style="list-style-type: none"> <li>• Identify areas of expansion on brownfield land</li> <li>• Protect soil quality</li> </ul>	<ul style="list-style-type: none"> <li>• Vacant &amp; derelict Land Surveys</li> <li>• Urban Capacity Studies</li> <li>• Areas of contaminated land</li> <li>• Land capable for agriculture classification maps</li> <li>• Peat rich soil maps</li> </ul>

<p>To avoid creation of flood risk and adverse significant effects on water bodies from impacts as a result of additional or re-phased allocations</p>	<p>Water</p>	<ul style="list-style-type: none"> <li>• Protect and enhance quality of watercourses in line with RBMP objectives</li> <li>• Identify areas of expansion away from flooding areas</li> <li>• Improve existing water/waste water infrastructure</li> </ul>	<ul style="list-style-type: none"> <li>• Status of major water courses</li> <li>• Location of flooding</li> <li>• Existing water/waste water infrastructure</li> </ul>
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## **4 Assessment of environmental effects**

### **Alternatives**

- 4.1 As stated in the Screening and Scoping Statement alternatives have not been considered for the SG. Due to the fact that there is a significant volume of background work in the SESplan SEA and the SSA on identifying sustainable areas for housing land and avoiding likely significant effects on the environment and the SG only adds to this work, it is not necessary to consider alternatives.
- 4.2 In addition the SSA has been updated as a part of the production of the SG and as a result this work provides an assessment underpinning the SG and negates the need to look at alternatives.

### **Assessment findings**

- 4.3 The matrix at Appendix 3 shows the detailed assessment of the increase in housing numbers as a result of the additional allowances and phasing changes by LDP area which are set out in the SG. These assessments set out the impacts of the increase in allowance compared to the Proposed Plan housing allowances per LDP area. Each Local Authority area change is assessed against the respective SEA topic and its SEA objective(s), a ranking is given and a text commentary is provided which justifies this ranking.
- 4.4 The findings of the detailed assessment are summarised in Table 6, and the paragraphs that follow provide a text commentary for each SEA topic.
- 4.5 A further matrix is produced to show the assessment of cumulative effects and there is also a text commentary elaborating on the findings.
- 4.6 There is discussion of any synergistic effects established.

Table 6 Summary of assessment findings									
Local Authority Area	Impact on SEA Topic								
	Key	xx	x	0		✓	✓✓		
		Major negative	Minor negative	Neutral		Minor Positive	Major Positive		
	Air	Biodiversity, fauna & flora	Climatic Factors	Cultural Heritage	Landscape & Townscape	Material Assets	Population & Human Health	Soil	Water
City of Edinburgh	0	0	?	0	x	0	✓	x	0
East Lothian	x	0	?	?	?	?	0	x	0
Fife	x	0	?	?	?	0	✓✓	0	0
Midlothian	0	0	x	0	0	0	✓	x	0
Scottish Borders	0	0	0	0	0	0	✓	0	0
West Lothian	0	0	?	?	0	0	✓✓	x	0

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## Air

4.7 The assessment of the Air topic largely centres on emissions from increased car journeys and the degree of significance that this will be the case versus development of public and sustainable transport links, the degree to which these measures help to mitigate increased emissions and the proximity of services, employment and other destinations to the SDAs and known or under development public and sustainable transport links. It is identified that where the additional housing requirement is a low value and there are good public transport and sustainable transport links, close to services, employment etc., then the assessment can reasonably be concluded as neutral.

4.8 In the Borders, the housing sites here are known precisely and as a part of the Proposed LDP SEA the sites have been assessed and no negative impact was identified. This was largely because the allocations are within settlements and are walking distance to town centres and links to the Borders Green Network. In Edinburgh it is considered that the measures being implemented in terms of public and sustainable transport links have the potential to significantly mitigate increased carbon emissions, and they are accessible to services, employment and other destinations, and therefore a neutral assessment is appropriate. In East Lothian and Fife, which are a further distance from Edinburgh, it is judged that the likelihood of increased car journeys is higher and that the public transport links are not as effective, especially as employment and services are located further away, therefore a minor negative impact is identified.

## **Biodiversity, flora & fauna**

4.9 The assessment is neutral across the Local Authority areas assessed. The Updated SSA ensures that additional land is located away from land important for biodiversity, and an HRA has concluded there will be no likely significant effects (LSE) on the site integrity of European Sites (subject to LDP level HRA). In addition, there will be some impacts on habitats from further use of greenfield land; however when the continued development of the CSGN<sub>1</sub> and open space associated with development is considered it is judged that the impacts will not result in negative impacts.

## **Climatic Factors**

4.10 Due to the fact that there are significant additional requirements out with SDA in Edinburgh and Fife, and there are also significant additional requirements in the East Lothian and West Lothian SDAs, which cover the entire area of these local authorities, the assessment in these areas is considered to be unknown. This is because it is only at LDP level where the precise location of the additional requirement will be known. It is possible in instances to assert that certain issues are more likely to be significant than others, for example where it is known development will be away from the coast. However conclusive environmental assessment will require to be done at LDP level. In Midlothian a minor negative impact is identified because of the risk of soil erosion from development on greenfield land.

## **Cultural Heritage**

4.11 The SESplan area has a large number of cultural heritage assets including Listed Buildings, Scheduled Monuments, Gardens and Designed Landscapes, Conservation Areas and a World Heritage Site. The assessment finds that almost all of the local authorities have a high degree of uncertainty on the significant effects that development of the additional requirement would bring on these respective assets, this is because, with the exception of the Borders, it is unclear precisely where or how the requirement proposed would be developed.

4.12 However it is considered that Policy 1B of the SESplan, 'Development Principles' prevents significant adverse impacts on the Cultural Heritage from LDPs allocating the housing requirement. In addition development of a design-led approach, particularly consideration of 'distinctive places' would likely build in assessment of the cultural heritage sites related to any particular housing sites. These two measures are considered to minimise the risk of negative impacts from the requirements identified in the SG, and as a result they also make a neutral assessment possible where there is greater detail available in terms of smaller SDAs or limited housing requirements. However, in larger SDAs or areas unknown, where little detail is provided, an unknown assessment has been considered appropriate.

## **Landscape & townscape**

4.13 It is considered that the level of greenfield land required in western parts of Edinburgh may result in a minor negative impact on the SEA topic. Due to the uncertainty in location of additional allocations in Fife and East Lothian it is not possible to give a defined assessment. It is thought that a design-led approach will help to mitigate impacts but this would need to be employed at the LDP level.

## **Material Assets**

4.14 In East Lothian the fact that the specific locations of the additional allocations are not identified means that a range of scenarios are possible and as such the assessment must be 'unknown'. In the majority of other member authority areas it is considered that the assessment is neutral. There is discussion of the possibility of the loss of land once used for mineral extractions, such as in Fife or West Lothian, however it is considered negative impacts are unlikely because LDP work will identify mineral resources that have potential and safeguard these from development; the SDAs have enough flexibility, due to their size, to allow development to be located away from these areas.

## **Population & human health**

4.15 The assessment findings are mainly positive. It was considered that significantly positive could be applied for all Local Authority areas, as was the case in the SESplan SEA; however the additional allocations raise the probability of housing being built in less sustainable parts of SDAs (particularly where they are outwith SDAs). However the significant majority of housing will remain within SDAs and there is additional benefits in terms of greater levels of affordable housing and tenure types. Where significant regeneration potential is identified in the Updated SSA then it is considered that this brings a significant positive effect when combined with the other factors, this is the case in Fife and West Lothian. However in East Lothian the positive benefits of the additional allocations may be checked by congestion on routes into Edinburgh and a lack of rail capacity.

## **Soil**

4.16 The majority of the assessments are minor negative. The original SESplan SEA found that there was the potential for minor negative impacts on the Soil SEA topic due to the fact that for certain Local Authority areas there would be substantial development on greenfield land and therefore there was potential for soil sealing. It is considered this assessment is still relevant to the additional allocations proposed in the SEA and the issue may be compounded. In the Borders and Fife it is considered that the respective lower levels of development and supply of brownfield land mean that a neutral impact is more likely. Mitigation measures discussed include the use of permeable construction methods, SUDS design and green infrastructure; however this would require support at LDP level.

## **Water**

4.17 The assessments for the Water SEA topic are all neutral. Discussion is made of the relative health of the water environment in certain Local Authority areas, including discussion of RBMP objectives where necessary, and on the flood risk in each area. Overall it is considered that although there is potential for negative impacts, it must be considered that legislation and Local Authority work at the LDP level will prevent negative impacts occurring.

## **Assessment of secondary, cumulative & synergistic effects**

### Secondary effects

4.18 Secondary effects are effects that are not a direct result of the SG, but are a secondary result of the original impact. The following secondary effects have been identified:



### *Climatic Factors*

4.19 The original SESplan SEA identifies a possible secondary effect on Climatic Factors from poor air quality in specific areas of the SESplan region. A rise in car usage could exacerbate greenhouse gases within the region. It is considered this assessment is still relevant when the assessment of the SG is considered, although the degree of this depends on the proportion of the additional allocations that are located in these specific areas of poor air quality and the proximity of sustainable transport links to the areas of poor air quality and the additional allocations.

### *Water*

4.20 Another possible secondary impact that was identified in the SESplan SEA was soil sealing within the SESplan region due to the development of greenfield land. It was found that this could impact on flooding incidents as the sealing of soil prevents soak away of water. It is considered that as the SG is highly likely to allocate additional allocations on greenfield land that this assessment is still relevant.

### *Cumulative effects*

4.21 Cumulative effects arise when a combination of developments accumulate together to have a significant effect, or where several individual effects of the SG have a combined effect. The following cumulative effects have been identified through the assessment process:

### *Air*

4.22 It is likely that there will be a cumulative impact on air quality in specific locations in the SESplan area due to increased car journeys from respective allocations in local authority areas, as well as from construction emissions. It is thought there could be particular pressure on key junctions or access routes into Edinburgh that flow from other local authorities (such as Sherrifhall roundabout), this would particularly be the case where effective public transport links were not provided.

### *Biodiversity, flora and fauna*

4.23 There is the potential for a cumulative effect on the biodiversity of the SESplan area. The development of additional allocations on greenfield land across the respective Local Authority areas may result in an overall loss of biodiversity for the SESplan area.

### *Climatic Factors*

4.24 Since a cumulative effect is identified on the Air SEA topic, due to increased emissions from motorised journeys and construction traffic, and the Soil SEA topic, due to potential soil erosion, soil sealing and loss of prime agricultural land from development on greenfield land, it is considered that this brings a potential adverse cumulative effect on the Climatic Factors SEA topic.

### *Soil*

- 4.25 The development of additional allocations on greenfield land may also result in a negative effect on soil quality in the SESplan area, due to soil erosion, soil sealing and loss of prime agricultural land.

### Synergistic Effects

- 4.26 Synergistic effects are a number of individual impacts that interact to produce a total effect that is different from the individual impacts identified. The following potential synergistic effects have been identified in terms of the SG:

### *Population & Human Health*

- 4.27 The original SESplan SEA identifies the potential of a synergistic impact on this SEA topic because of the combination of air pollution and a potential rise of CO<sub>2</sub> emissions could have an impact on human health issues. It is considered that this assessment still applies, however the development of the CSGN and open space associated with development of allocations will help to mitigate this effect.

## **5 Measures to prevent/reduce/offset significant adverse effects**

- 5.1 The assessment of the additional allocations and re-phasing of existing allocations raised a number of issues that will require to be mitigated to avoid significant effects on the environment of the SESplan area.
- 5.2 Table 7 below shows the issues that have been identified, the possible impact and the proposed measures for the prevention/reduction/offset of any significant effect.

Table 7 Measures envisaged for the prevention, reduction & offsetting of any significant adverse effects		
SEA Topic	Issues identified	Measures to reduce/prevent/offset
Air/Climatic Factors	Negative effect on air quality and increase in CO <sub>2</sub> emissions as a result of an increase in car journeys	<ul style="list-style-type: none"> <li>- Additional allocations must be served by sustainable forms of transport to ensure maximum opportunities for reduced car usage</li> <li>- Accessibility to the CSGN should be a key consideration in deciding precisely where additional allocations are located</li> <li>- Hot spot areas such as AQMA areas should be protected from further air pollution</li> <li>- Measures to promote modal shift to sustainable transport and the development of sustainable transport routes and infrastructure should be promoted</li> </ul>
Cultural Heritage	Impact of development of additional allocations on cultural heritage assets in the SESplan area	<ul style="list-style-type: none"> <li>- Design-led approach at LDP level to include assessment of development of allocations on cultural heritage assets</li> </ul>
Landscape & townscape	Impact of development of additional allocations on greenfield land on the setting and surrounds of settlements in the SESplan area	<ul style="list-style-type: none"> <li>- The SSA should prevent development being located where there is the risk of adverse effects on landscape designations, wider landscape and settlement setting</li> <li>- Allocation of land should provide places that are distinctive, in line with the Designing Places document, in that they positively respond to the wider landscape context in which they are situated</li> <li>- Conservation Areas should be protected through management plans and/or conservation area statements</li> </ul>
Soil	Soil sealing as a result of development on greenfield land	<ul style="list-style-type: none"> <li>- Brownfield sites should be primarily considered for additional allocations</li> <li>- Measures to reduce the impact of soil sealing should be considered wherever possible, such as permeable surfaces, green infrastructure and compensatory measures</li> </ul>
Water	Soil sealing within the SESplan region due to the development of greenfield land and impact on flooding incidents through run-off and loss of soak away land	<ul style="list-style-type: none"> <li>- Identification of compensatory storage opportunities, including within the CSGN (LDP level)</li> <li>- Identification of areas of strategic SUDs areas (LDP level)</li> <li>- Identification of vulnerable areas</li> </ul>

## **6 Monitoring**

- 6.1 The SG is essentially an extension of the SESplan document, and it is unclear whether there will be a requirement for a further Housing Supplementary Guidance over and above the future SESplan SDP 2 document.
- 6.2 This affects the monitoring of the SEA objectives in this document in that it is anticipated that monitoring should be undertaken by the SESplan member Local Authorities, as was the case for the original SESplan SEA.
- 6.3 A Monitoring Report has been undertaken for the SESplan. In the future, this report should incorporate the monitoring needs identified within the SESplan SEA and this SEA on the Housing Supplementary Guidance.

## **7 Next Steps**

- 7.1 The Housing Supplementary Guidance and the Environmental Report will go to consultation for a period of 6 weeks. After this time comments on both documents will be reviewed and appropriate changes made to the Supplementary Guidance before it is approved by the member Local Authorities and the SESplan board.
- 7.2 Once the document is approved a Post Adoption Statement will be prepared and advertised and circulated as per the requirements of the Environmental Assessment (Scotland) Act.

<b>Appendix 1: Consultation Authority Comments on Scoping Report</b>		
<b>Consultation Authority</b>	<b>Summary of Comments</b>	<b>Response and action</b>
Historic Scotland	...understanding from the screening report is that the supplementary guidance will provide guidance on how much of the housing land requirement for the SESplan area will be in each of the six SESplan Local Authority areas, both in the period 2009-2029 & 2019-2024. The guidance will be based on analysis of opportunities and of infrastructure and environmental capacities and constraints and will be undertaken in consultation with the six constituent Local Authorities. I note that it is SESplan's view that the Draft Housing SG is likely to have significant environmental effects. In light of the information included in the screening report I agree that it is likely that the SG will have significant effects on the historic environment.	<p>The understanding is correct, however it should be noted there was a typographical error in the Screening/Scoping statement which is repeated here: the first phase of housing is 2009-2019 not 2009-2029.</p> <p>It is not considered that any action needs to be taken as a result of this representation.</p>
SEPA	...in respect of our main areas of interest (air, water, soil, human health, material assets (of which we have a specific interest in waste) and climatic factors) the Draft SESplan Housing Supplementary Guidance is likely to have significant environmental effects.	Note agreement on the likelihood of significant environmental effects.
	...we consider that significant effects are with respect to flood risk, air quality and climate change (mitigation and adaptation). As identified in the screening report, these effects could be experienced in proposed new allocations and in existing allocations where cumulative or in-combination effects should be considered.	Note opinion on the effect on the respective SEA topic and the nature of the effect likely to be experienced.

	<p>...you will be aware that the next stage requires the Responsible Authority to consult the Consultation Authorities on the proposed scope and level of detail to be included within the Environmental Report. This can be undertaken through preparation of a concise Scoping Report.</p> <p>We would encourage you to use the scoping process to focus the assessment on those SEA issues upon which there are likely to be significant environmental effects, to outline the baseline information you consider as most relevant and explain your proposed methodology of assessment</p>	<p>The submission to the SEA gateway on 13 August contained a Screening and Scoping Statement and as a result a further separate submission is not forthcoming. However, it is considered that the original report did explain the approach the assessment of SEA issues would take; outlined the approach to the prospective baseline; and explained the methodology of the assessment that would be included in the Environmental Report</p>
SNH	<p>Table 2 refers to Habitats Regulations Appraisal in relation to “impact on European species”. While this is likely a typographical error, we wish to confirm that HRA considers effects on European sites</p>	<p>This is a typographical error and further references in the Environmental Report will be updated.</p>
	<p>We note that a period of up to 12 weeks is proposed for consultation on the draft supplementary guidance. As it is expected that the Environmental Report will go to consultation alongside the supplementary guidance, we assume this will run for the same length of time. We are content with the indicated consultation period.</p>	<p>It is anticipated that the consultation periods will run concurrently</p>
	<p>Criterion 2c- transboundary effects: significant effects are predicted for this criterion, with the summary of these referring to changes outwith the SESplan area, including the Forth Estuary. In the context of SEA, transboundary effects are those which would affect another EU Member State. As there is nothing to suggest that this would be the case, the answer in column 2 can be changed to No.</p>	<p>The information on transboundary effects in the context of SEA is noted and taken on board in preparation of the Environmental Report.</p>
	<p>Relationship with other PPS- we agree with the proposed approach to the baseline for PPS and other environmental objectives</p>	<p>Agreement of these elements of the Environmental Report and methodology is noted.</p>

	<p>Current state of the environment- The additional use of an update to the Spatial Strategy Assessment to inform identification of the most appropriate locations for housing is useful for supporting and refining assessment...we welcome this more streamlined approach to the assessment.</p>	<p>Support for the methodology of the assessment is noted.</p>
	<p>Green belt- Table 2 includes the green belt under Climatic Factors. SPP sets out the functions of the green belt as directing planned growth; protecting and enhancing the quality, character, landscape setting and identity of towns and cities; and, protecting and giving access to open space within and around towns and cities...suggest that the green belt should be included as an issue under the Landscape &amp; Townscape SEA topic.</p>	<p>This clarification on the purpose of the green belt is useful and it will be primarily considered under the Landscape &amp; Townscape SEA topic in the Environmental Report for the reasons described in SPP.</p>
	<p>SEA topics- we agree that all of the SEA topics should be re-examined in the Environmental Report</p> <p>SEA topics- Scope &amp; level of detail-</p> <ul style="list-style-type: none"> <li>- Areas that were previously excluded from the SDAs on the grounds of sustainability appear likely to be revisited to meet the housing number requirements. In doing so, we refer you to the design-led approach set out in the draft revised SPP, which seeks to balance the range of interests and potential opportunities over the long term. While the detail will be set out in the LDPs, the draft revised SPP is clear that the design-led approach applies at all levels</li> <li>- The screening and scoping report refers to 'certain locations' throughout. We are unclear as to how these relate to the SDAs and look forward to discussing this further on 28 August and as the supplementary guidance is developed</li> </ul>	<p>Note agreement on the finding that all SEA topics should be re-examined.</p> <ul style="list-style-type: none"> <li>- The reference to the design-led approach as set out in the draft revised SPP is noted and it is considered reference can be made to this where appropriate in the Environmental Report.</li> <li>- 'certain locations' was intended to show that particular parts of the SESplan area that are considered for either re-phasing of existing housing allocations, or for additional allocations, are likely to experience different environmental effects i.e. some areas may be at risk of flooding,</li> </ul>

		while in other areas this could not occur. The wording can be more carefully articulated in the Environmental Report.
	Framework for assessment- We accept the proposed framework for assessment...the design-led approach...should be applied to the SDAs and certain locations where changes in numbers and phasing are proposed.	Support for the proposed assessment framework is noted. The design-led approach can be incorporated where appropriate in the Environmental Report.
	Monitoring- The screening and scoping report states at paragraph 6.6 that the SEA process is likely to culminate in the post-adoption statement. This statement appears to omit monitoring from the SEA process.	It was not intended to omit monitoring from the SEA process. A chapter on monitoring will be included in the Environmental Report.



<b>Appendix 2 Relevant Plans, Policies and Strategies</b>		
<b>Name of Plan</b>	<b>Environmental Requirements of Plan</b>	<b>Implications for the SEA</b>
Air		
The Air Quality Strategy for England, Scotland, Wales and Northern Ireland. Working Together for Clean Air (2007)	Sets out the air quality strategy for the UK with objectives and targets, referring to the Environment Act 1995 legislation. It seeks a reduction in the levels of 8 harmful pollutants present in the air, which in turn promote: <ul style="list-style-type: none"> <li>• the protection of human health; and</li> <li>• the protection of vegetation and ecosystems</li> </ul>	<b>Air &amp; Population &amp; Human Health:</b> SG should ensure that housing allocations do not exacerbate existing Air Quality Management Areas (AQMA), nor result in designation of further AQMA
Local Air Quality Management Act (Part of the Environmental Act 1995)	Sets out duties requiring local authorities to review and assess air quality in their area from time to time, the reviews forming the cornerstone of the system of local air quality management.	<b>Air:</b> sets out requirements to reduce air pollution which SG should adhere to. <b>Population &amp; Human Health:</b> looks to maintain and improve air quality for the benefit of human health to which the SG should take cognisance of.
Edinburgh Air Quality Action Plan (2008- 2010)	Sets out declared Air Quality Management Areas (AQMA) and details the initiatives required to meet targets to improve air quality.	<b>Air:</b> sets out initiatives to reduce air pollution which SG should take cognisance of. <b>Population &amp; Human Health:</b> looks to improve air quality for the benefit of human health to which the SG should take

		cognisance of.
Scotland's National Transport Strategy (2006)	<ul style="list-style-type: none"> <li>• Promote social inclusion by connecting remote and disadvantaged communities and increasing the accessibility of the transport network:</li> <li>• Protect our environment and improve health by building and investing in public transport and other types of efficient and sustainable transport which minimize emissions and consumption of resources and energy</li> <li>• Improve safety of journeys by reducing accidents and enhancing the personal safety of pedestrians, cyclists, drivers, passengers and staff.</li> </ul>	<p><b>Material Assets:</b> SG should seek to integrate with the aims of the National Transport Strategy.</p> <p><b>Population &amp; Human Health:</b> SG should aim to allocate housing levels which allow for sustainable development, particularly access to sustainable transport methods</p>
Strategic Transport Projects Review (STPR) (2008) (Draft Subject to SEA Consultation)	<p>STPR complements the National Transport Review and seeks to:</p> <ul style="list-style-type: none"> <li>• improve journey times and connections – to tackle congestion and the lack of integration and connections in transport which impact on our high level objectives for economic growth, social inclusion, integration and safety</li> <li>• reducing emissions – to tackle the issues of climate change, air quality and health improvement which impact on our high level objective for protecting the</li> </ul>	<p><b>Material Assets:</b> SG should seek to integrate with the aims of the STPR.</p> <p><b>Population &amp; Human Health:</b> SG should support the STPR interventions aimed at reducing congestion, emissions etc and improving human health. As well as to promote allocations accessible by sustainable transport</p> <p><b>Climatic Factors and Air:</b> SG should support the STPR interventions aimed at reducing</p>

	<p>environment and improving health, and</p> <ul style="list-style-type: none"> <li>improving quality, accessibility and affordability – to give people a choice of public transport, where availability means better quality transport services and value for money or an alternative to the car</li> </ul>	<p>congestion, emissions etc such as tackling issues of climate change and the availability of better forms of public transport to reduce dependency on cars.</p>
SESTRAN Regional Transport Strategy (2008-2023)	<ul style="list-style-type: none"> <li>to ensure that development is achieved in an environmentally sustainable manner: reducing greenhouse gas emissions and other pollutants and enabling sustainable travel/ reduce car dependency</li> <li>to promote a healthier and more active SEStran area population</li> </ul>	<p><b>Material Assets:</b> SG should seek to integrate with the aims of the transport strategy</p> <p><b>Climatic Factors and Air Quality:</b> SG should contribute to ensuring that development is achieved in an environmentally sustainable manner, helping to maintain air quality where possible</p> <p><b>Population &amp; Human Health:</b> SG should promote allocations with sustainable access to recreation</p>
SPP Planning for Transport	<p>The national focus on transport is now on delivery of transport projects. For the transport network to most effectively support the economy, land use planning should assist in reducing the need to travel; in creating the right conditions for greater use of sustainable transport modes and in restricting adverse environmental impacts.</p>	<p><b>Material Assets:</b> the SG should plan allocations which assist in reducing the need to travel and contributes to sustainable transport nodes.</p>

PAN 75 Planning for Transport	PAN 75 accompanies SPP and aims to create greater awareness of how linkages between planning and transport can be managed. It highlights the roles of different bodies and professions in the process and points to other sources of information.	<b>Material Assets:</b> the SG should plan allocations in a manner which assists in reducing the need to travel and contributes to sustainable transport nodes.
<b>Biodiversity, Flora and Fauna</b>		
Nature Conservation (Scotland ) Act (2004)	Introduced a 'duty to further the conservation of biodiversity' for all public bodies, and sets out more specific provisions within this (e.g. for SSSIs). Also states a requirement for the preparation of a Scottish Biodiversity Strategy, to which all public bodies should pay regard.	<b>Biodiversity, flora &amp; fauna:</b> SG should aim to avoid allocations where the region's natural heritage assets may be adversely affected.
Scotland's Biodiversity – It's In Your Hands. A strategy for the conservation and enhancement of biodiversity in Scotland (2004)	Sets out Scottish aims relating to biodiversity over 25 year period. Seeks to go beyond a previous emphasis on protecting individual sites to achieve conservation at a broader scale. Aims to halt loss and reverse decline of key species, to raise awareness of biodiversity value at a landscape or ecosystem scale, and to promote knowledge, understanding and involvement amongst people.	<b>Biodiversity, flora &amp; fauna:</b> SG should aim to avoid allocations where the region's natural heritage assets may be adversely affected.
Choosing Our Future – Scotland's Sustainable Development	Details the Scottish Government's strategy for tackling issues such as climate change, biodiversity, resource use and pollution.	<b>Biodiversity, flora &amp; fauna:</b> SG should aim to avoid allocations where the region's natural heritage assets may be adversely affected.

Strategy (2005)		<p><b>Climatic Factors &amp; Air:</b> SG should allocate housing land to minimise the impact on climate change and to build in mitigation and climate change adaptation.</p> <p><b>Material Assets:</b> SG should aim to minimise resource depletion and encourage the responsible use of natural resources by allocating land in sustainable locations</p>
SPP: Natural Heritage PAN 60 Planning for Natural Heritage (2000)	The conservation of Scotland's plants, animals, landscapes, geology, natural beauty and amenity is important and should be considered in all development plans.	<p><b>Biodiversity, flora &amp; fauna &amp; Landscape &amp; townscape:</b> SG should aim to avoid allocations where the region's natural heritage assets and designated landscapes may be adversely affected.</p>
The Scottish Forestry Strategy (2006) (and associated SEA)	<p>Key themes include to:</p> <ul style="list-style-type: none"> <li>• reduce the impact of climate change;</li> <li>• get the most from Scotland's increasing and sustainable timber resource;</li> <li>• make access to and enjoyment of woodlands easier</li> </ul>	<p><b>Biodiversity, flora &amp; fauna:</b> SG should avoid allocations which may adversely affect the region's forest assets</p> <p><b>Population &amp; Human Health:</b> SG should aim to allocate land where access to biodiversity and green infrastructure benefits is possible</p>

	<ul style="list-style-type: none"> <li>• for all to improve health;</li> <li>• protect the environmental quality of our natural resources; and</li> <li>• help to maintain, restore and enhance Scotland's biodiversity</li> </ul>	by sustainable means
<p>Local Biodiversity Action Plan's East Lothian (2008 – 2013)</p> <p>Edinburgh (2004-2009)</p> <p>Fife Local Biodiversity Action Plan (2009-2011)</p> <p>Midlothian (2006)</p> <p>Scottish Borders (2001)</p> <p>West Lothian (2005 – 2009)</p> <p>Midlothian Biodiversity Guidance for Developers (2008)</p>	<p>The LBAPs translate national targets for species and habitats into effective local action, stimulates local working partnerships into tackling biodiversity conservation, raises awareness, identify local resources, identify local targets for species and habitats, ensure delivery and monitor progress.</p>	<p><b>Biodiversity, flora &amp; fauna:</b> SG should avoid adversely affecting key habitats and species as identified therein by allocating land where likely significant effects will be avoided.</p>
<p>Environmental Strategies</p> <p>Edinburgh Environmental Strategy</p> <p>Draft East Lothian Environment Strategy (2007 – 2009)</p>	<p>Key themes include:</p> <ul style="list-style-type: none"> <li>• safeguard, promote and improve the social, economic, environmental and democratic wellbeing of all the people in the local authority area</li> </ul>	<p><b>Biodiversity, flora &amp; fauna:</b> SG should avoid adversely affecting the biodiversity assets of the region by allocating land where likely significant effects will be avoided.</p> <p><b>Population &amp; Human Health:</b> SG should aim</p>

<p>Take a Pride in Fife – Environmental Strategy for Fife – Review and Update (2006) Scottish Borders New Ways Environmental Strategy</p>		<p>to allocate land where access to biodiversity and green infrastructure benefits is possible by sustainable means</p>
<p>Local Woodland/ Forestry Strategies Edinburgh and the Lothians Forestry and Woodland Strategy (2012-2017)  Fife Indicative Forestry Strategy  Scottish Borders Woodland Strategy (2005)</p>	<p>The creation, through forestry and woodland initiatives, of an attractive environment providing biodiversity and green infrastructure benefits and to improve the health and well being of the area.</p>	<p><b>Biodiversity, flora &amp; fauna:</b> SG should avoid allocations which may adversely affect the region's forest assets  <b>Population &amp; Human Health:</b> SG should aim to allocate land where access to biodiversity and green infrastructure benefits is possible by sustainable means</p>

<p>Planning Scotland's Seas Scotland's National Marine Plan Consultation Draft</p>	<p>Sets a strategic plan to cover inshore waters (to 12 nautical miles) and offshore waters (12-200 nautical miles). Marine planning will interact with other planning and consenting regimes. The Scottish marine planning system should promote development and activities that support sustainable economic growth.</p>	<p><b>Biodiversity, flora &amp; fauna:</b> SG should avoid allocating land where marine based natural heritage assets may be adversely affected. <b>Water:</b> SG should avoid allocating land where designated water bodies may be adversely affected. Allocated land should aim to fit with relevant policy aims for water bodies</p>
<p>Climatic Factors</p>		
<p>SPP : Renewable Energy Pan 45 Renewable Energy Technologies (2005) (and Annex on Planning for Micro- renewables) PAN 84 Reducing Carbon Emissions in New Development (2008)</p>	<p>The Scottish Ministers have set a target of generating 80% of Scotland's electricity from renewable sources by 2020. The importance of using clean and sustainable energy from renewable sources will continue to increase as a result of global imperatives to tackle climate change and the need to ensure secure and diverse energy supplies. PAN 45 complements SPP and highlights examples of good practice across Scotland. A key role of the planning system is to support a move towards low and zero carbon development through the use of energy efficient, micro-generating and decentralised renewable energy systems. PAN 84 provides information and guidance on</p>	<p><b>Climatic Factors, Air &amp; Material Assets:</b> SG should consider the allocation of land where the possibility of infrastructure to assist towards low and zero carbon development can be explored</p>



	implementing the targets set in SPP.	
Changing Our Ways – Scotland’s Climate Change Programme (2006)	Details the Scottish Executive’s (now Government’s) programme for reducing and adapting to climate change.	<b>Climatic Factors, Air &amp; Material Assets:</b> SG should consider the allocation of land where the possibility of infrastructure to assist towards low and zero carbon development can be explored
Climate Change (Scotland) Act 2009	Act to: <ul style="list-style-type: none"> <li>• set a target for the year 2050, an interim target for the year 2030, and to provide for annual targets, for the reduction of greenhouse gas emissions;</li> <li>• to provide about the giving of advice to the Scottish Ministers relating to climate change;</li> <li>• to confer power on Ministers to impose climate change duties on public bodies;</li> <li>• to make further provision about mitigation of and adaptation to climate change;</li> <li>• to make provision about energy efficiency;</li> <li>• to make provision about the reduction and recycling of waste</li> </ul>	<b>Climatic Factors, Air &amp; Material Assets:</b> SG should consider the allocation of land where the possibility of infrastructure to assist towards low and zero carbon development can be explored.

Energy Efficiency and Microgeneration: achieving a Low Carbon Future: A Strategy for Scotland (2008)	Strategy sets out the action to take to help Scotland meet carbon savings targets etc outlined in Changing Our Ways – Scotland’s Climate Change Programme (2006) through improving energy efficiency and encouraging a greater uptake of microgeneration.	<b>Climatic Factors, Air &amp; Material Assets:</b> SG should consider the allocation of land where the possibility of infrastructure to assist towards low and zero carbon development can be explored.
Biomass Action Plan for Scotland (2007)	The Biomass Action Plan sets out a coordinated programme for the development of the biomass sector in Scotland and aims to: <ul style="list-style-type: none"> <li>• provide a summary of the wide range of existing activities, actions and initiatives;</li> <li>• provide a focus for a strategic coordinated approach to developing biomass for energy production across the heat, electricity and transport sectors;</li> <li>• identify roles and responsibilities for government, industry and public stakeholders to develop a vibrant bioenergy industry in Scotland; and</li> <li>• identify future actions and gaps</li> </ul>	<b>Climatic Factors, Air &amp; Material Assets:</b> SG should consider the allocation of land where the possibility of infrastructure to assist towards low and zero carbon development can be explored, particularly with regard to biomass.
Scotland’s Climate Change Adaptation Programme	Sets out Scottish Minister objectives, proposals & policies for addressing the impacts identified by the UK Climate	<b>Climatic Factors, Air &amp; Material Assets:</b> SG should consider the allocation of land and the

- Consultation	Change Risk Assessment that have been identified as a priority for Scotland over the next 5 years.	potential to either avoid impacts which may affect climate change, or combine with climate change adaptation/mitigation measures
<b>Cultural Heritage (including architectural and archaeological heritage)</b>		
Scottish Historic Environment Policy (SHEP) (July 2011)	SHEP is the overarching policy statement for the historic environment. It provides a framework for more detailed strategic policies and operational policies that inform the day-to-day work of a range of organisations that have a role and interest in managing the historic environment.	<b>Cultural Heritage:</b> SG should impact as little as possible on the historic environment.
SPP: Planning and the Historic Environment	The historic environment is a vital contribution to Scotland's cultural heritage and contributes to our understanding of the past and present. The conservation of the historic environment should be carefully integrated with other policies to ensure its survival.	<b>Cultural Heritage:</b> SG should impact as little as possible on the historic environment.
PAN 71 Conservation Area Management	This provides further advice on the management of conservation areas. It identifies good practice for managing change, sets out a checklist for appraising conservation areas and provides advice on funding and implementation.	<b>Landscape and Townscape:</b> SG should aim to avoid a negative impact on conservation areas in the SESplan area.
<b>Landscape and Townscape</b>		
Creating Places A Policy	Policy statement on architecture and place which looks to	<b>Landscape and Townscape:</b> the value of

Statement on architecture and place (2013)	consolidate and develop the value of architecture and place in Scotland. The policies contained within the document promote good design and are material considerations in determining applications	quality places and design should be considered when allocating land in the SG
Designing Places: A Policy Statement for Scotland (2001)	Policy statement on design which sets out the overarching policy on design including the six qualities that make a successful place –distinctive, safe and pleasant, easy to get to and move around, welcoming, adaptable and resource efficient.	<b>Landscape and Townscape:</b> the six qualities of good design that make a successful place should be considered when allocating land in the SG
Pan 44 Fitting New Housing Development into the Landscape	Strategically, establishing landscape capacity and the relationship of new to existing urban forms as primary factors in determining the desirability of settlement expansion  Promoting higher design standards relative to form layout and relation with existing urban areas	<b>Landscape and Townscape:</b> SG should promote development which fits into the existing landscape and townscape.
SPP Planning and countryside designations	The SPP sets out the national planning policy framework for the protection of prime agricultural land and green belt objectives.	<b>Landscape and Townscape:</b> SG should reflect national policy on agricultural land and green belts.
Pan 52 Planning and Small Towns	Identifying factors which threaten the important legacy of small towns: <ul style="list-style-type: none"> <li>• Providing for regeneration and expansion</li> </ul>	<b>Landscape and Townscape:</b> SG should take cognisance of the aims of the document when considering allocating land which may affect

	<ul style="list-style-type: none"> <li>• Enabling lively, active and vibrant town centres within small towns</li> <li>• Enabling efficient and effective transport to support economic growth and accessibility</li> <li>• Promoting high quality design that promotes townscape quality</li> </ul>	small towns
PAN 65 Planning and Open Space (2003)	Provides advice on the role of the planning system in protecting and enhancing existing open spaces and providing high quality new spaces.	<b>Landscape and Townscape and Population and human health:</b> SG should aim to allocate land which has the potential to access or incorporate high quality open space
PAN 72: Housing in the Countryside	Advice on design of houses in the countryside with a purpose to create more opportunities for good quality rural housing which respects Scottish landscapes and building tradition.	<b>Landscape and Townscape:</b> SG should seek to create opportunities for good quality rural housing in the SESplan area, if applicable in the determination of allocations.
SPP: Planning for Rural Development	Planning policy which encourages a more supportive attitude towards 'appropriate' development whilst acknowledging and valuing the diversity of rural Scotland.	<b>Landscape and Townscape:</b> SG should seek to create opportunities for good quality rural housing in the SESplan area, if applicable in the determination of allocations.
SPP: Green Belts	Key objectives of green belt policy are: <ul style="list-style-type: none"> <li>• To direct planned growth to the most appropriate locations and support regeneration;</li> </ul>	<b>Landscape and Townscape:</b> SG should respect designated green belts within the SESplan area in the allocation of housing

	<ul style="list-style-type: none"> <li>• To protect and enhance the character, landscape setting and identity of towns and cities; and</li> <li>• To protect and give access to open space within and around towns and cities, as part of the wider structure of green space</li> </ul>	land.
<p>Landscape Character Assessments</p> <p>Edinburgh Landscape Character Assessment (2010)</p> <p>Landscape capacity studies for Lochgelly, Glenrothes, Kirkcaldy and Levenmouth - undertaken by Alison Grant for Fife Council (2002)</p> <p>Fife Local Landscape Designation Review 2008/9</p> <p>The Lothians Landscape Character Assessment (1998)</p> <p>Edinburgh Greenbelt Landscape Character Assessment (2008)</p>	<p>The aim of Landscape Character Assessments is to classify landscape within certain areas, to identify the forces for change which may affect their distinctive character, give guidelines for conservation/enhancement of the different types of landscape and to find opportunities for landscape conservation, restoration or enhancement</p>	<p><b>Landscape and Townscape:</b> SG should seek to support conservation and enhancement of different types of landscape in the SESplan area.</p>

The Special Qualities of the National Scenic Areas	The work provides a complete picture of Scotland's nationally designated landscapes. This is done through an update of the original reasons for the designation and through provision of a methodology to assess special qualities of the National Scenic Areas, two of which are located in the SESplan area	<b>Landscape and Townscape:</b> SG should seek to support conservation and enhancement of the two nationally designated landscapes in the SESplan area and their special qualities.
Second State of Scotland's Greenspace Report	Sets out the amount and types of greenspace for all of urban Scotland. Charts Local Authority progress on open space strategies	<b>Landscape and Townscape and Population and human health:</b> SG should aim to allocate land which has the potential to access or incorporate high quality open space
<b>Material Assets</b>		
Rural Development Programme for Scotland, The Strategic Plan, 2007-2013 (2006)	<ul style="list-style-type: none"> <li>• Promote an environmentally sustainable industry by targeting capital investment to mitigate farm pollution and secure environmental improvement;</li> <li>• developing products that reflect the high quality of the natural and cultural heritage; and</li> <li>• supporting the production of feedstock for renewable energy production</li> </ul>	<b>Climatic Factors:</b> SG should take cognisance of the need to produce feedstock for renewable energy production and any potential for conflict with allocating land for housing.
Zero Waste Plan (2010)	The aims of the Plan are to create a stable framework that will provide confidence for the investment necessary to deliver a zero waste Scotland over the next 10 years. To	<b>Material Assets:</b> SG should consider measures for sustainable waste management when allocating housing land

	achieve this Scotland's demand on primary resources by minimizing Scotland's demand on primary resources, and maximizing the reuse, recycling and recovery of resources instead of treating them as waste.	
SPP: Planning for Waste Management	<p>Waste has increased in volume and complexity over the last five decades and the guidance sets out options to follow to:</p> <ul style="list-style-type: none"> <li>• reduce waste;</li> <li>• re-use;</li> <li>• recovery by recycling;</li> <li>• waste as a source of energy; and</li> <li>• treatment and disposal of the remaining waste in a sustainable and environmentally friendly manner</li> </ul>	<b>Material Assets:</b> SG should consider measures for sustainable waste management when allocating housing land
<b>Population &amp; Human Health</b>		
Our National Health: A Plan for Action, A Plan for Change (2000)	Poverty, poor housing, homelessness and the lack of educational and economic opportunity are the root causes of major inequalities in health in Scotland. The core aims are to build a national effort to improve health and to reduce inequalities in health.	<b>Population &amp; Human Health:</b> SG should consider the location of housing allocations in contributing to improving the health of the SESplan area.
SPP: Physical Activity and Open Space	<ul style="list-style-type: none"> <li>• To protect and enhance open space;</li> <li>• To ensure a strategic approach to open space and</li> </ul>	<b>Population &amp; Human Health:</b> SG should consider access to areas for sport and



	<p>other opportunities for sport and recreation by requiring local authorities to undertake an open space audit and prepare an open space strategy for their area;</p> <ul style="list-style-type: none"> <li>• To protect and support opportunities for sport and recreation;</li> <li>• To provide guidance on the quality and accessibility of open space in new developments and on providing for its long-term maintenance and management;</li> <li>• To provide guidance on planning for development of new indoor and outdoor facilities for sport and recreation.</li> </ul>	recreation by sustainable means when allocating housing land
Member Authority Health and Wellbeing Plans and Joint Health Improvement Plans	<p>Health and wellbeing are fundamental to quality of life. Improving health and addressing health inequality involves wide-ranging action across not just health and care services but also public services including education, employment, housing, community safety and environment.</p>	<b>Population &amp; Human Health:</b> SG should consider how the allocation of housing land can positively affect health in the SESplan area
Member Authority Core Paths Plans and Access Strategies	Core Paths Plans and Access strategies look to promote themes of:	<b>Population &amp; Human Health:</b> SG should contribute towards improving the health and

	<ul style="list-style-type: none"> <li>• green spaces</li> <li>• human health and well being</li> <li>• accessibility</li> <li>• inclusion</li> <li>• biodiversity</li> </ul>	well being of the SESplan area by promoting housing which is close to core paths and accessibility to the countryside and green spaces.
Central Scotland Green Network	<p>The Central Scotland Green Network looks to promote:</p> <ul style="list-style-type: none"> <li>• Access to attractive, safe and well maintained greenspace or accessible countryside</li> <li>• to improve the green infrastructure of all our major towns and cities by investing in green and blue space, tree planting and sustainable urban drainage</li> <li>• to deliver a threefold increase in the area of land used for community growing – allotments, orchards and gardens</li> <li>• to deliver a strategic network of high-quality routes for active travel and recreation throughout Central Scotland</li> <li>• to ensure that the green network is used by everyone to improve health and well-being through physical activity and contact with nature, volunteering and learning outdoors</li> <li>• to foster community pride and ownership in the CSGN and to use the green network as a community resource, providing opportunities for education, volunteering, training, skills development and</li> </ul>	<b>Population &amp; Human Health:</b> SG should consider the potential for housing allocations to be accessible to the Central Scotland Green Network

	employment in land-based and low-carbon industries	
Member Authority Community Plans or Single Outcome Agreements (SOAs)	Community Plans and SOAs focus on achieving measurable improvements to the quality of life for all in the local authority area and provide a framework for delivering long term visions for the area. The Community Plan sets the context for continued joint working between the Local Authority Area and the local community and its partner agencies.	<b>Population &amp; Human Health:</b> SG should consider any community plan indicators on housing when allocating land in the SESplan area
Member Authority Strategic Housing Investment Plan (SHIP)	SHIPs set out how investment in affordable housing will be directed over the next 5 years to achieve the outcomes set out in there associated Local Housing Strategy.	<b>Population &amp; Human Health:</b> SG should take account of the outcomes set out in each local authority areas Local Housing Strategy.
Strategic Noise Action Plan for the Edinburgh Agglomeration	The three main objectives of the Directive are as follows: <ul style="list-style-type: none"> <li>• To determine the noise exposure of the population through noise mapping</li> <li>• To make information available on environmental noise to the public</li> <li>• To establish Action Plans based on the mapping results, to reduce noise levels where necessary, and to preserve environmental noise quality where it is good</li> </ul>	<b>Population &amp; Human Health:</b> SG should not add to noise levels and seek to preserve noise quality where it is good, when allocating housing land.

Pan 74 Affordable Housing	Advice setting out how the planning system can support the Scottish Government's commitment to increase the supply of affordable housing.	<b>Population and Human Health:</b> SG should make clear affordable housing will be a proportion of the housing land to be allocated
<b>Soil</b>		
PAN 33 Development of Contaminated Land (2000)	Document provides advice with regards to the development of contaminated land, which any developments will need to adhere to.	<b>Soil:</b> SG should follow this guidance on development in areas of contaminated land.
The Contaminated Land (Scotland) Regulations (2005)	Details activities that are prohibited to prevent the contamination of land and watercourses.	<b>Soil:</b> SG should not conflict with these regulations.
Scottish Soil Framework (2009)	The main aim of the Framework is to promote the sustainable management and protection of soils consistent with the economic, social and environmental needs of Scotland. Activities identified for focus include: <ul style="list-style-type: none"> <li>• soil organic matter stock protected</li> <li>• soil erosion reduced</li> <li>• greenhouse gas emission from soils reduced</li> <li>• soil's capacity to adapt to changing climate enhanced</li> <li>• soil biodiversity as well as above ground biodiversity</li> </ul>	<b>Soil:</b> SG should promote the sustainable management of soils.

	<ul style="list-style-type: none"> <li>protected soils making a positive contribution to sustainable flood management</li> </ul>	
<b>Water</b>		
The Water Environment and Water Services (Scotland) Act 2003 (Designation of Scotland River Basin District) Order 2003	Ensures that all human activity that can have a harmful impact on water is controlled.	<b>Water:</b> SG should follow all appropriate guidance and legislation.
SEPA (2008) Finalised River Basin Management Plans: Scotland River Basin District and Solway Tweed River Basin District	<ul style="list-style-type: none"> <li>Identifying areas of the water environment for protection and improvement</li> <li>Identifying where current or historic activities are constraining the quality of the water environment and the biodiversity it supports</li> <li>Details the actions required to ensure waters of special value (e.g. drinking, biodiversity, shellfish, bathing) are up to standard and maintain the quality where they already meet those standards</li> <li>Set out actions needed to deliver environmental improvements over the next 6 years and longer to 2027</li> </ul>	<b>Water:</b> SG proposals should avoid deterioration of the water environment.
Flood Risk Management	The Scottish Ministers, SEPA and responsible authorities	<b>Water:</b> SG should not create flood risks

(Scotland) Act 2009	<p>must exercise their flood risk related functions with a view to reducing overall flood risk through:</p> <ul style="list-style-type: none"> <li>• promotion of sustainable flood risk management, acting with a view to raising public awareness of flood risk, and acting in the way best calculated to contribute to the achievement of sustainable development.</li> </ul>	through the allocation of housing land
SPP: Planning and Flooding	<p>SPP provides guidance to developers and planning authorities on planning and flooding. New development should not take place if it would be at significant risk of flooding from any source or would materially increase the probability of flooding elsewhere. The storage capacity of functional floodplains should be safeguarded, and works to elevate the level of a site by land raising should not lead to a loss of flood water storage capacity.</p> <p>Drainage would be a material consideration and the means of draining a development should be assessed. Sustainable drainage would be required whenever practicable and watercourses should be culverted. Flood prevention and alleviation measures should respect the wider environmental concerns and appropriate engineering</p>	<b>Water:</b> SG should not create flood risks through the allocation of housing land

	solutions recognise the context provided by the development plan. Whilst it is preferable for open spaces to flood rather than buildings it may not always be acceptable.	
PAN 69: Planning and Building Standards Advice on Flooding (2004)	The PAN supports SPP.	<b>Water:</b> SG should not create flood risks through the allocation of housing land
Member Authority biennial reports on flooding	Under the Flood Prevention and Land Drainage (Scotland) Act 1997 Local Authorities are required to publish a report at 2 yearly intervals specifying: the measures which they consider that they require to take to prevent or mitigate the flooding of land in their area; the measures which they have taken since the date of publication of their previous report to prevent or mitigate the flooding of such land and all occurrences of flooding of such land since that date	<b>Water:</b> SG should not create flood risks through the allocation of housing land
SPP: Coastal Planning	SPP notes that the developed coast should be the focus for developments requiring a coastal location, or which contribute to economic regeneration of settlements whose livelihoods is dependent on coastal or marine activities and features.	<b>Water:</b> SG should ensure any housing at a coastal location is necessary for the vitality of the area in question
SEPA Position Statement to	Position statement sets out the aims to prevent	<b>Water Status:</b> SG should take account of the

support the implementation of Water Environment (controlled activities) (Scotland) Regulations 2005: - Culverting watercourses	environmental issues associated with culverting	environmental issues associated with culverting and seek to avoid the need to implement any culverting from the allocation of land.
Scottish Water Strategic Asset Capacity and Development Plan	Outlines the current capacity at water and wastewater treatment works across Scotland to let local authorities and developers see “at a glance” what capacity currently exists at a particular location in Scotland. It is intended to use this information to decide whether work will have to be carried out by Scottish Water to increase capacity at treatment works to enable a particular development to go ahead.	<b>Water:</b> SG should check current capacity before allocating major land in the SESplan area.
Scottish Water, Water Resource Plan (2008)	Set out the strategy to ensure that customers, the length and breadth of Scotland, have a secure supply of clear, fresh, safe drinking water to 2031/32 and beyond. The key environment challenges are: to adapt to pressures on water resources due to climate change and environmental constraints.	<b>Water:</b> SG should not add any additional pressure to Scottish Water resources.
The Marine (Scotland) Act (2010)	The Marine (Scotland) Act provides a framework which will help balance competing demands on Scotland's seas. It	<b>Water:</b> SG should take account of the Marine Bill when planning anything that could impact on coastal waters and/or the sea



	introduces a duty to protect and enhance the marine environment and includes measures to help boost economic investment and growth in areas such as marine renewables	
Fife Shoreline Management Plan: Second Generation (2011)	Takes into account natural coastal processes, existing development, need for coastal defences, environmental considerations and planning issues. Delivers policies to guide sustainable coastal management over the next 20, 50 and 100 years	<b>Water:</b> SG should be aware of and take account of the natural heritage interests along the Fife coast.
Other		
NPF2 and SPP Scottish Planning Policy (2010)	Set out the national planning framework and the main purpose and tasks for land use planning, development planning and control for Scotland.	<b>All:</b> underpins the development and implementation of the SG.

## APPENDIX 3: Detailed Assessments

Possible rankings					
Very Positive	Positive	Negative	Very Negative	Neutral	Unknown
✓	✓✓	x	xx	0	?

**Table 1: City of Edinburgh**

Environmental Objectives	Potential impact of change to allocation and phasing on environmental objectives	Comments
<b>Air:</b> To sustain current air quality levels	<b>0</b>	<p>The updated SSA states that south east Edinburgh and west Edinburgh are preferred locations for additional development. The SG puts forward an additional 1500 houses in South East Edinburgh and an additional 700 in West Edinburgh. Edinburgh is where the majority of employment, services and other destinations are located and relative distances from the SDAs (and areas outwith) are close to these areas, so much so that public transport and sustainable transport links are an effective option.</p> <p>For south-east Edinburgh the SESplan SEA stated that a lower number of total houses could have a minor negative impact and a higher total number could have a significant negative impact. However there is no mention of the long term impact of the Borders rail (a station at Shawfair is in this area) which will be operational by 2015, nor of the proposed tram route, which would be a long term development. These public transport links would have potential to lessen the impact of additional motorised journeys on the A720 and A1. The most appropriate conclusion for this SDA is that there will be mixed impacts, there is likely to be an increase in car journeys, which will affect already congested routes and increase emissions. However, there are measures to help mitigate this effect, although the</p>

		<p>precise impact cannot yet be quantified.</p> <p>West Edinburgh has excellent public transport links, with development already commenced on further improvements. It is considered that these links can significantly mitigate increased overall emissions from motorised journeys on routes which are congested, although it is difficult to quantify this precisely.</p> <p>Two areas in Edinburgh- Edinburgh North West (around Queensferry + Kirkliston) and Edinburgh South West (around Ratho, Juniper Green and Currie) are considered most likely to provide for the City of Edinburgh requirement for the Areas Outwith SDA, with a requirement of 2500 to be met. The Updated SSA states that the public transport links are very good in these areas and as a result a similar assessment to the West Edinburgh SDA is considered reasonable.</p> <p>Overall it is considered reasonable to identify that there are mixed impacts from the additional requirement, there will be increased motorised journeys and this brings the risk of negatively impacting air quality due to congestion and increased emissions. However there is significant work done to help mitigate the impact of emissions and it is hoped the usage of these measures will make a significant impact, particularly given the relatively short distances to employment, services and other destinations. Overall a neutral score is considered appropriate.</p>
<p><b>Biodiversity, flora &amp; fauna:</b> To avoid adverse effects on natural heritage assets of the SESplan area as a result of the location of additional or re-phased allocations</p>	0	<p>The assessment is judged to be neutral and this opinion is based on the Proposed Plan SEA and the updated SSA. Development is located away from designated areas, and the HRA will confirm there are no likely significant effects (LSE) on European sites, particularly to the North West where the Firth of Forth SPA is located (subject to LDP level HRA). There may be short-term impacts on the habitat network from development on greenfield land but the articulation of the CSGN in the respective areas may mitigate these.</p>
<p><b>Climatic Factors:</b> To minimise CO<sub>2</sub> emissions</p>	?	<p>It is considered there will be increased emissions because of construction (temporary) and car journeys (short-long term). The respective SDAs are</p>

<p>as a result of location of additional or re-phased allocations</p>		<p>located in highly accessible locations due to good public transport links, which will be improved by the Borders rail, the tram line and other rail network improvements. There is also significant potential for sustainable transport through existing cycle and other paths and continued development of the CSGN. These measures should help to mitigate climate change through encouraging modal shift from private cars onto public transport, which brings less total emissions or sustainable transport, which brings significantly less carbon emissions. The areas outwith SDA required bring uncertainty to the assessment, it is unknown where these will be located. As a result the balance of the assessment should be unknown.</p>
<p><b>Cultural Heritage:</b> To safeguard the built and historic environment from impacts as a result of additional or re-phased allocations</p>	<p><b>0</b></p>	<p>There are a number of garden and designed landscapes (GDL), Scheduled Monuments (SM), Conservation Areas and Listed Buildings located within the two SDAs and also in the areas to the north west and south east where the Outwith SDA requirement might be located. As a result it is considered almost certain that at least a part of the allocation of the requirement at the LDP level will impact on cultural heritage assets. It is difficult to provide a more detailed assessment but if a design-led approach, particularly to do with creating “distinctive places” is employed at a LDP level then it is considered that this will require assessment of the respective cultural heritage assets. In addition SESplan Policy 1B prevents significant adverse impacts on the integrity of international and national built or cultural heritage. On balance a neutral assessment is considered appropriate, because there is detail on what areas will be developed and therefore there is knowledge of what parts of the cultural heritage would be affected.</p>
<p><b>Landscape &amp; townscape:</b> To protect the landscape and townscape within the SESPlan area from impacts as a result of additional or re-phased allocations.</p>	<p><b>x</b></p>	<p>The SESplan SEA and updated SSA both raise the prospect of the loss of greenfield land on the surrounds of Edinburgh but conclude that this will not be significant. In South East Edinburgh additional allocations may be able to be accommodated alongside a planned community at Shawfair and this would consolidate the land lost to one location. At the West of Edinburgh a similar situation could occur, close to business locations and tram/rail services. In any scenario, design led development at a LDP level to build on the updated SSA findings will be important to establishing sustainable development from the additional allocations. However it is considered that</p>

		a minor negative impact is likely, particularly along the western side of Edinburgh when the three areas of additional/re-phased allocations are considered against the loss of greenbelt land.
<b>Material Assets:</b> To ensure sustainable location of additional or re-phased allocations regarding necessary infrastructure	<b>0</b>	The SESplan SEA states that development in the South East and West of Edinburgh will not bring negative effects: there is unlikely to be pressure on minerals required for development and waste can be dealt with by Edinburgh Council. It is considered that this assessment is still relevant even with additional allocations and the two areas outwith the SDAs. A design-led approach at LDP level could incorporate the need for/or accessibility to waste management facilities (such as recycling centres). As a result the assessment is neutral for all areas.
<b>Population &amp; human health:</b> To improve the quality of life and human health for communities in the SESplan area	✓	The assessment is judged to be positive. The SESplan SEA states that there will be a significant positive effect from housing in the South East and West of Edinburgh; however the alternative assessment, which looks at a higher growth scenario, is only assessed as neutral. It is considered appropriate to rank the assessment as positive because the majority of housing, even with the two areas outwith the SDA incorporated, will be located in areas that are accessible to public transport, services and greenspace. In addition there are relatively good transport links to the centre of Edinburgh, although the areas vary respectively, but also to areas further afield. The incorporation of a design led approach to masterplanning at a LDP level will consolidate the positive effect.
<b>Soil:</b> To minimise the impact on soil quality from impacts as a result of additional or re-phased allocations, and to adhere to contaminated land regulations	✘	The SESplan SEA identifies a residual negative effect for both Edinburgh areas because the development will primarily be on greenfield land and not on brownfield land. In addition the Updated SSA highlights that prime agricultural land will also be required to be used. Negative effects can be offset somewhat by the use of permeable construction materials, SUDS design and green infrastructure. However this would require policy direction at LDP level, as a result it is considered that the residual effect is minor negative
<b>Water:</b> To avoid creation of flood risk and adverse significant effects on water bodies from	<b>0</b>	The assessment is judged to be neutral. Edinburgh Local Development Plan work should mean that additional allocations will be located away from known areas of flood risk, however there will need to be cognisance of the risk of surface water flooding, particularly around the Gogarburn and River

impacts as a result of additional or re-phased allocations		Almond in West Edinburgh/ North West Edinburgh. Commitment to the relevant RBMP objectives; development of green infrastructure; the CSGN and further flood risk work at the LDP level should help to protect the water environment
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**Table 2: East Lothian**

<b>Environmental Objectives</b>	<b>Potential impact of change to allocation and phasing on environmental objectives</b>	<b>Comments</b>
<b>Air:</b> To sustain current air quality levels	<b>x</b>	The SG puts forward an additional 2810 units. It is unclear at this stage where precisely the allocated land will be located within the Local Authority boundaries however it is judged that there is a risk of increased emissions from increased volume of motorised journeys on roads into Edinburgh and in Musselburgh, particularly due to the fact that these roads are congested. The Updated SSA finds that in general East Lothian is accessible by public transport methods; however there are capacity issues on the ECML. The outcome of the Berwick Local Rail Study, which would take passengers off the North Berwick line, is considered important to assist transport issues in the area. Overall the assessment is considered to be minor negative.
<b>Biodiversity, flora &amp; fauna:</b> To avoid adverse effects on natural heritage assets of the SESplan area as a result of the location of additional or re-phased allocations	<b>0</b>	The Updated SSA states that the only area within the East Lothian authority area that would likely be unsuitable for further allocations is the coastal area. This is considered beneficial to biodiversity due to the Firth of Forth SPA and the biodiversity potential the coastal area contains. The Updated SSA also seeks to avoid development which could affect other European sites, and this is confirmed by the HRA, which confirms no LSE on any European Sites (subject to LDP level HRA). However given the uncertainty over the location of development in the rest of the authority area as a precaution the assessment is neutral.
<b>Climatic Factors:</b> To minimise CO <sub>2</sub> emissions as a	<b>?</b>	The assessment of the housing potential in East Lothian is less certain because of the wide geographical area where housing may be

<p>result of location of additional or re-phased allocations</p>		<p>located. There is adaptation to climate change built in because the Updated SSA states there will be no additional allocations located at the coast and this therefore avoids future issues to do with sea level rises, coastal erosion and more severe coastal flooding. However soil erosion in greenfield areas as a result of housing development would be a risk as there is limited supply of brownfield land. It is likely that climate change mitigation will be provided by locating housing in areas accessible to public transport or sustainable transport links, incorporating links to the continued development of the CSGN. These measures should help mitigate climate change through a reduction in greenhouse gas emissions. However, there is already congestion on routes into Edinburgh from East Lothian and it is likely that more housing will exacerbate this and this brings the potential for negative effects. Due to the uncertainty over the location of the additional housing requirement the assessment should be unknown.</p>
<p><b>Cultural Heritage:</b> To safeguard the built and historic environment from impacts as a result of additional or re-phased allocations</p>	<p>?</p>	<p>The assessment is unknown. It is almost certain that cultural heritage assets will be affected to some degree by development of the housing requirement but the lack of detail on precise locations is not available and even with the application of a design-led approach, and a focus on “distinctive places” and SESplan Policy 1B, which prevents significant adverse impacts on Cultural Heritage, the large size of the SDA means that on balance an unknown assessment is appropriate.</p>
<p><b>Landscape &amp; townscape:</b> To protect the landscape and townscape within the SESPlan area from impacts as a result of additional or re-phased allocations.</p>	<p>?</p>	<p>Due to the uncertainty of the precise location of the additional allocations a number of scenarios are possible. The fact that additional development should be steered away from the coast is a positive, as the setting of towns and villages in this area can be protected. However, there is still significant potential for adverse significant effects in other areas, particularly settlements that bring a sense of place and character to East Lothian, and on areas of land designated green belt to the west of the Local Authority area. It is considered that whatever scenario is decided a design-led approach, incorporating masterplanning exercises would be the best mitigation to avoid adverse significant effects.</p>
<p><b>Material Assets:</b></p>	<p>?</p>	<p>Again the precise impact on the SEA topic cannot be established</p>

To ensure sustainable location of additional or re-phased allocations regarding necessary infrastructure		because of the uncertainty over precise locations of allocations. There are existing mine workings which could be redeveloped and if this was to occur further extraction would not be possible. It is also possible that transport infrastructure would require examined, particularly where roads are at capacity in the west of the Local Authority area.
<b>Population &amp; human health:</b> To improve the quality of life and human health for communities in the SESplan area	<b>0</b>	It is considered that there is uncertainty over the transport links into Edinburgh, with the potential for congestion possibly negating the benefits of the strategic location East Lothian has with regards to Edinburgh. However, East Lothian is an attractive area to live with excellent recreation potential. As a result the assessment is neutral.
<b>Soil:</b> To minimise the impact on soil quality from impacts as a result of additional or re-phased allocations, and to adhere to contaminated land regulations	<b>x</b>	The SESplan SEA identifies that East Lothian has limited brownfield land available for redevelopment and therefore allocations are likely to be on greenfield land where soil sealing is a risk. In addition the Updated SSA recognises that there will be a loss of prime agricultural land. It is judged that permeable construction, SUDS design and promotion of green infrastructure can lessen the impacts identified. However a negative impact on soil quality is still anticipated.
<b>Water:</b> To avoid creation of flood risk and adverse significant effects on water bodies from impacts as a result of additional or re-phased allocations	<b>0</b>	Even without knowing the exact location of additional and re-phased allocations it is considered that Local Development Plan work will avoid areas of known flood risk. In addition existing legislation and policy which seeks to promote and protect the water environment will help to avoid negative effects. As a result the assessment is judged to be neutral.

**Table 3: Fife**

<b>Environmental Objectives</b>	<b>Potential impact of change to allocation and phasing on environmental objectives</b>	<b>Comments</b>
<b>Air:</b>	<b>x</b>	The SG puts forward an additional 2130 units in the North



<p>To sustain current air quality levels</p>		<p>Dunfermline SDA and 2720 units in the Ore/Upper Leven Valley SDA Both of these areas are considered to be highly accessible by sustainable transport but also by car (as identified in the Updated SSA). In addition a further 1150 units in areas outwith the two SDAs are also proposed, a precise location for these units has not been provided as yet however it is likely they would generate additional motorised journeys to some degree, particularly given the distance to Edinburgh, and employment, services and other destinations. As a result the most objective assessment is considered to be minor negative.</p>
<p><b>Biodiversity, flora &amp; fauna:</b> To avoid adverse effects on natural heritage assets of the SESplan area as a result of the location of additional or re-phased allocations</p>	<p>0</p>	<p>The HRA concludes no r LSE on European Sites (subject to LDP level HRA) across all areas. There may be some impact on habitat networks from development on greenfield land; however it is considered that work to develop the CSGN, and to provide additional open space, may mitigate this. As a result it is considered that a neutral assessment is appropriate.</p>
<p><b>Climatic Factors:</b> To minimise CO<sub>2</sub> emissions as a result of location of additional or re-phased allocations</p>	<p>?</p>	<p>The two SDA are located in areas where coastal erosion, sea level rise and flood risk will not be issues and therefore adaptation to climate change is built in. However, the areas outwith SDA bring greater potential that flood risk could be an issues, particularly more severe coastal and inland flooding associated with climate change. Fife generally has areas available for regeneration; this is beneficial to climate change mitigation in that development can be targeted to brownfield areas, and to adaptation, as there is less risk of soil erosion and loss of prime agricultural land due to the need to meet the housing requirement. The Updated SSA states that the two SDA have good public transport links and spare rail capacity, this should help mitigation through reducing carbon emissions associated with modal transport. However, it is still likely that emissions would increase due to increased car and public transport journeys. There is uncertainty over the impact of the areas outwith SDA and as a result, the balance of the overall assessment should be unknown.</p>
<p><b>Cultural Heritage:</b> To safeguard the built and historic</p>	<p>?</p>	<p>The assessment is unknown. As previously described the lack of detail of precisely where the housing will be located makes it too</p>

environment from impacts as a result of additional or re-phased allocations		difficult to apply a precise assessment (negative or positive) despite measures which bring significant potential for prevention and mitigation of a negative impact, because it is unknown what cultural heritage assets will be affected.
<b>Landscape &amp; townscape:</b> To protect the landscape and townscape within the SESPlan area from impacts as a result of additional or re-phased allocations.	?	The Updated SSA ensures that the two SDA where the additional allocations will be located are away from the AGLV designated in Fife. However no guarantee can be provided for the Areas Outwith SDA. A similar scenario is envisaged for south Dunfermline, where a greenbelt is proposed. The setting of towns in the respective SDAs is an important consideration. The development of the additional allocations will need to be backed by design-led masterplanning work, which takes into account the setting and character of these settlements. Overall the assessment is considered to be unknown due to the lack of precise location for the Areas Outwith the SDA.
<b>Material Assets:</b> To ensure sustainable location of additional or re-phased allocations regarding necessary infrastructure	0	The SESplan SEA findings, which state that there is the possibility of a minor negative effect due to the history of the area for mine workings, are relevant when considered against additional allocations across Fife and this may bring a minor negative impact. However it is now considered that with careful, design-led masterplanning work that the benefits of regeneration of the area can be achieved and any mineral workings where extraction may still be possible can be avoided. As a result the assessment is neutral.
<b>Population &amp; human health:</b> To improve the quality of life and human health for communities in the SESplan area	✓✓	The Updated SSA states that the Ore/Leven Valley SDA scores particularly well for regeneration potential and there is longer term work which has identified this area for future growth, regeneration and environmental improvement. The North Dunfermline SDA is considered particularly accessible and scores relatively well elsewhere in the assessment. It is not considered that the uncertainty of the Areas Outwith SDA necessarily changes the assessment for this SEA topic and as a result it is considered to be significantly positive.
<b>Soil:</b> To minimise the impact on soil quality from impacts as a result of	0	The assessment is neutral. It is considered that there should not be significant impacts on the soil resource from additional housing allocations due to the fact that Fife has a large supply of brownfield

additional or re-phased allocations, and to adhere to contaminated land regulations		land that can be redeveloped.
<b>Water:</b> To avoid creation of flood risk and adverse significant effects on water bodies from impacts as a result of additional or re-phased allocations	<b>0</b>	There are areas of flooding identified on SEPA's flood extent map within the two SDA and between them and any increased risk will need to be avoided by work at LDP level. The water quality in the area is generally poor or moderate according to SEPA, and additional allocations will need to ensure this water quality level is not exacerbated in line with RBMP objectives. Overall it is considered there is a neutral impact as a result of the additional allocations, despite the uncertainty of the Areas Outwith SDA, as LDP work should be able to mitigate the identified impacts.

**Table 4: Midlothian**

<b>Environmental Objectives</b>	<b>Potential impact of change to allocation and phasing on environmental objectives</b>	<b>Comments</b>
<b>Air:</b> To sustain current air quality levels	<b>0</b>	Additional allocations are located in the A7/A68/Borders Rail Corridor (100 units). It is not considered that this figure would significantly affect air quality, particularly given public and sustainable transport options, and the development of the Borders rail, which should combine to lessen the impact of carbon emissions from motorised transport. However, development should avoid exacerbating the existing poor air quality around Pathhead and it is recognised that congestion on routes into Edinburgh is a significant issue. Overall however a neutral assessment is considered appropriate.
<b>Biodiversity, flora &amp; fauna:</b> To avoid adverse effects on natural heritage assets of the SESplan area as a result of the	<b>0</b>	The assessment is neutral. It is considered that the areas where the additional allocations are likely to be placed are largely already affected by development and that the Updated SSA ensures the areas of land allocated are away from designated land. Local authority

location of additional or re-phased allocations		policy frameworks will also help prevent any negative impacts on designated natural heritage assets. Continued development of the CSGN and provision of open space accessible to allocations should help to mitigate any disturbance of habitat networks.
<b>Climatic Factors:</b> To minimise CO <sub>2</sub> emissions as a result of location of additional or re-phased allocations	<b>x</b>	The additional allocations in the A7/A68/Borders rail corridor may bring some potential to exacerbate congestion on routes into Edinburgh, however there are both public and sustainable transport options, which will be bolstered by the Borders Railway, and these help mitigate climate change by reducing carbon emissions. The land for the additional 100 units will likely need to be on greenfield/prime agricultural land and this brings the risk of soil erosion and loss of productive land which are negative in terms of adaptation to climate change. Where there is potential soil erosion, associated exacerbation of flood risk could be an issue. It is noted that Midlothian Council have undertaken a SFRA as a part of the production of their LDP and this considers climate change impacts. On balance it is considered that the assessment is minor negative.
<b>Cultural Heritage:</b> To safeguard the built and historic environment from impacts as a result of additional or re-phased allocations	<b>0</b>	It is considered that the limited housing requirement identified in the SG and the combination of Policy 1B, which prevents significant impacts on cultural heritage and the development of distinctive places in line with a design-led approach at the LDP level would allow for a neutral impact despite the uncertainty over where in the SDAs development would actually occur
<b>Landscape &amp; townscape:</b> To protect the landscape and townscape within the SESPlan area from impacts as a result of additional or re-phased allocations.	<b>0</b>	The SESplan SEA identifies that there are numerous AGLVs throughout Midlothian and negative effects from the additional allocations are possible. Nonetheless, longer term areas for expansion have already been identified with minimal impact on these landscape designations. The Updated SSA has considered the landscape in assessing the potential for additional and re-phased allocations and it is concluded that the A7/A68/Borders Rail Corridor SDA has capacity. At a LDP level, it is considered a design-led approach; incorporating masterplans of parcels of land for development would help to avoid adverse effects on the setting of settlements located in the SDA. As a result a neutral assessment is

		considered appropriate.
<b>Material Assets:</b> To ensure sustainable location of additional or re-phased allocations regarding necessary infrastructure	0	The assessment is judged to be neutral. The SESplan SEA states that development in the relevant Midlothian SDA will not bring negative effects: there is unlikely to be pressure on minerals required for development and waste can be dealt with by Midlothian Council. It is considered that this assessment is still relevant even with additional allocations in the A7/A68/Borders Rail Corridor.
<b>Population &amp; human health:</b> To improve the quality of life and human health for communities in the SESplan area	✓	The assessment is positive. Additional allocations will encourage development in areas that already provide employment, services and are on the transport network through Midlothian, most specifically the Borders Rail. Additional development should also provide affordable housing and enhanced greenspace.
<b>Soil:</b> To minimise the impact on soil quality from impacts as a result of additional or re-phased allocations, and to adhere to contaminated land regulations	x	The SESplan SEA identifies a minor negative effect because of the fact some development will be on greenfield land and soil sealing is therefore a risk. This assessment is considered to be relevant to the additional allocations. It is not considered that there is a significant change as it is unclear how much additional land to that already assessed will be on greenfield land and how much on brownfield land. It is the case that LDPs could encourage permeable construction, SUDS design, and the incorporation of green infrastructure.
<b>Water:</b> To avoid creation of flood risk and adverse significant effects on water bodies from impacts as a result of additional or re-phased allocations	0	It is generally considered that there is scope for development in the A7/A68/Borders Rail Corridor that would avoid adverse significant effects on the water environment, and which does not result in flood risk, and that therefore a neutral assessment is appropriate. Nonetheless there will require to be work at LDP level to ensure that the water environment is not adversely affected, and that flood risk is avoided.

**Table 5: Scottish Borders**

Environmental Objectives	Potential impact of change to allocation and phasing on environmental objectives	Comments
<p><b>Air:</b> To sustain current air quality levels</p>	<p><b>0</b></p>	<p>The additional and re-phased allocations for the respective Borders SDAs- 110 in the Eastern Borders; 85 in the Central Borders; and 5 in the Western Borders, and 30 units outwith these SDAs, are considered to be limited in scale, especially given the size of the SDAs. The Borders has no areas that are close to AQMA designation, however car journeys are necessary due to the rural nature of the authority and limited public transport links, therefore it is recognised that this is a source of carbon emissions. The Borders Rail brings the potential for less car journeys particularly for the Central Borders SDA where the majority of the additional/re-phased housing is located and this may mitigate carbon emissions, although the degree to which this is the case is unknown. A rail stop at Reston could have a similar effect for the Eastern Borders, although again the extent of this is unknown.</p> <p>The Borders Proposed LDP has been subject to SEA and the allocations (which include the additional requirement identified in the SG) have been assessed as to their impact on the Air SEA topic. No negative impacts were found largely because of the proximity of the allocations to town centres and sustainable transport links. It was also considered that the limited size of the allocations and the high air quality were pertinent factors</p>
<p><b>Biodiversity, flora &amp; fauna:</b> To avoid adverse effects on natural heritage assets of the SESplan area as a result of the location of additional or re-phased allocations</p>	<p><b>0</b></p>	<p>The Borders has a high quality natural environment with a number of designations, particularly the River Tweed SAC, which is present in all three SDAs. The Updated SSA ensures that no housing sites will be located on designated natural heritage sites, and in addition there are significant local policies and initiatives which help to protect the natural environment in the Borders. The possibility of LSE from</p>

		additional allocations of housing on designated sites in the Borders remains however and an HRA will be required to examine this further. The HRA findings when combined with the Borders LDP HRA mean that there will be no LSE on the conservation objectives of European Sites
<b>Climatic Factors:</b> To minimise CO <sub>2</sub> emissions as a result of location of additional or re-phased allocations	<b>0</b>	The additional requirement is very limited in the Borders. Allocations are located away from the coastline and from areas of known flood risk, in addition Borders Council have undertaken a SFRA. As a result it is considered that adaptation to climate change in terms of flood risk is built in. Allocation of land is a mixture between brownfield, mixed use allocations, which help to mitigate climate change through reducing the impact of transport and efficient resource use, and limited loss of prime agricultural land, which in the future may have an impact on food security and soil erosion, which brings a negative impact on climate change adaptation. On balance the assessment of neutral is considered appropriate.
<b>Cultural Heritage:</b> To safeguard the built and historic environment from impacts as a result of additional or re-phased allocations	<b>0</b>	The assessment is neutral. There is a difference in the assessment for the Scottish Borders to the other Local Authorities because the additional allocations are already worked into the Proposed Local Development Plan and therefore it is known that where there are impacts on cultural heritage assets that mitigation has been provided.
<b>Landscape &amp; townscape:</b> To protect the landscape and townscape within the SESPlan area from impacts as a result of additional or re-phased allocations.	<b>0</b>	Although the Borders has a high quality landscape, shown in the designation of the two NSA, it is considered that this limited increase in allocations will not significantly affect landscapes or townscapes of the Borders. Again a design-led approach at the LDP level to the promotion of allocations will help to ensure that the landscape and character of Borders towns is integral to the development that results.
<b>Material Assets:</b> To ensure sustainable location of additional or re-phased allocations regarding necessary infrastructure	<b>0</b>	It is considered the limited additional allocations do not result in increased pressure on mineral resources, or any land required for the production of these resources, or infrastructure requirements needed to support the allocations, however some work requiring assets would be required and as a result the assessment is neutral.
<b>Population &amp; human health:</b> To improve the quality of life and	✓	The assessment is positive. Additional allocations will largely encourage development in areas that already provide employment,

<p>human health for communities in the SESplan area</p>		<p>services and are on the transport network, most specifically the Borders Rail. Additional development should also provide affordable housing, enhanced open space and links to sustainable transport networks. There is a requirement to ensure that areas outwith the central Borders also experience the benefits of sustainable development that the Central Borders does, particularly from the Borders Railway.</p>
<p><b>Soil:</b> To minimise the impact on soil quality from impacts as a result of additional or re-phased allocations, and to adhere to contaminated land regulations</p>	<p><b>0</b></p>	<p>The assessment is neutral. The Borders has a degree of brownfield land which has potential for redevelopment and due to the limited nature of the additional allocations the pressure on greenfield and prime agricultural land should not be significant.</p>
<p><b>Water:</b> To avoid creation of flood risk and adverse significant effects on water bodies from impacts as a result of additional or re-phased allocations</p>	<p><b>0</b></p>	<p>The Borders water environment, focussed on the River Tweed which is subject to a River Basin Management Plan, is highly important. As a result there is potential for adverse impacts from additional allocations; however the scale of these allocations, when considered against possible impacts, is limited and the water environment is tightly managed and has a significant policy and legislation framework which prevents adverse impacts. The Scottish Borders Proposed LDP is at the Period of Representations and the SEA concludes a neutral impact on the Water environment, this is relevant because the Proposed LDP includes additional allocations and re-phasing as proposed in the SG. As a result a neutral assessment is considered appropriate in this SEA.</p>



**Table 6: West Lothian**



Environmental Objectives	Potential impact of change to allocation and phasing on environmental objectives	Comments
<p><b>Air:</b> To sustain current air quality levels</p>	<p><b>0</b></p>	<p>The additional allowance is for 375 houses and this is considered to be a limited amount given the size of the SDA. There is uncertainty as to where precisely the housing will be located and this makes the assessment more complex. However, it is considered that the SESplan SEA, which stated that it was unlikely there would be effects on air quality due to the existing public transport links to Edinburgh and Glasgow, and the promotion of sustainable transport links such as the CSGN is still relevant to this assessment. Although it should be recognised that there is congestion on routes into Edinburgh and there is potential that inappropriately sited housing could increase emissions. Overall it is judged that the additional allocations will not lead to significant change to the existing neutral assessment from the Updated Environmental Report for SESplan.</p>
<p><b>Biodiversity, flora &amp; fauna:</b> To avoid adverse effects on natural heritage assets of the SESplan area as a result of the location of additional or re-phased allocations</p>	<p><b>0</b></p>	<p>The Updated SSA and LDP policy will ensure no development is located on or adjacent to designated nature sites, for European Sites the HRA confirms no LSE on the conservation objectives of European Sites (subject to LDP level HRA). It is considered that there may be impacts on habitat networks from limited development on greenfield land; however the provision of open space and the continued development of the CSGN to provide additional habitat will assist in mitigating these. As a result the assessment is neutral.</p>
<p><b>Climatic Factors:</b> To minimise CO<sub>2</sub> emissions as a result of location of additional or re-phased allocations</p>	<p><b>?</b></p>	<p>The limited additional requirement given the size of the SDA is considered relevant to assessment of this topic. Generally it is expected the requirement would be met away from the coast and therefore adaptation is built in by removing coastal climate change issues. However, there is a risk of increased inland flooding issues and at this time it is unclear what the West Lothian LDP process will do to avoid this risk, there is no SFRA undertaken at this time. West Lothian has excellent public and sustainable transport links, with the</p>

		addition of the tram lines and continued development of the CSGN giving potential to bolster these links. As a result there is the potential to mitigate carbon emissions from private car journeys to a significant degree. On balance the assessment must be unknown because of the uncertainty over where the additional requirement will be located and the lack of information on flood risk.
<b>Cultural Heritage:</b> To safeguard the built and historic environment from impacts as a result of additional or re-phased allocations	?	The assessment is unknown. West Lothian is a large SDA and the size makes an objective assessment very difficult, even with the mitigation and prevention of a design-led approach at the LDP level, and Policy 1B of SESplan which prevents significant adverse impacts.
<b>Landscape &amp; townscape:</b> To protect the landscape and townscape within the SESplan area from impacts as a result of additional or re-phased allocations.	0	Although development of additional allocations would bring the potential to improve the townscapes of West Lothian towns though regeneration of brownfield land, it is also considered there may be negative impacts from development on greenfield land and the possibility of impacts on AGLV to the north and west of West Lothian. A design-led approach to masterplanning the additional allocations at a LDP level would help to mitigate any negative impacts. As a result the assessment is neutral.
<b>Material Assets:</b> To ensure sustainable location of additional or re-phased allocations regarding necessary infrastructure	0	The SESplan SEA stated that although a negative impact was unlikely, that the area is rich in mineral deposits and that there was a risk that development may prevent their extraction. However with a design led approach and further LDP work identifying mineral resources then negative impacts could be mitigated as a result the assessment is neutral.
<b>Population &amp; human health:</b> To improve the quality of life and human health for communities in the SESplan area	✓✓	It is considered that the additional allocations, as informed by the Updated SSA, will be located in an area which is highly accessible to public transport, services and open space. In addition there are excellent links to areas further afield, due to the rail-line, Edinburgh airport and the Forth Road Bridge. There is also the likelihood of significant regeneration. As a result the assessment impact is considered to be significantly positive.
<b>Soil:</b> To minimise the impact on soil	x	The SESplan SEA identifies a negative effect because of the fact development will be on greenfield land and soil sealing is therefore a

<p>quality from impacts as a result of additional or re-phased allocations, and to adhere to contaminated land regulations</p>		<p>risk. This assessment is considered to be relevant to the additional allocations and re-phasing of housing land as it is likely that further greenfield land would be required to meet the development potential of the additional allocations. There would be the possibility of introducing mitigation through permeable construction, SUDS design and green infrastructure at a LDP level.</p>
<p><b>Water:</b> To avoid creation of flood risk and adverse significant effects on water bodies from impacts as a result of additional or re-phased allocations</p>	<p><b>0</b></p>	<p>The SEPA flooding map shows that there are areas of flooding within the SDA and work would be required at LDP level to ensure development of allocations did not exacerbate this flood risk. In addition there are important parts of the water environment, such as the River Almond and Union Canal, which would require protection and enhancement in line with the Scotland RBMP objectives. Overall the assessment is considered to be minor negative as the lack of precise detail on where the additional allocations will be located means that negative effects could arise on either flooding or the water environment.</p>

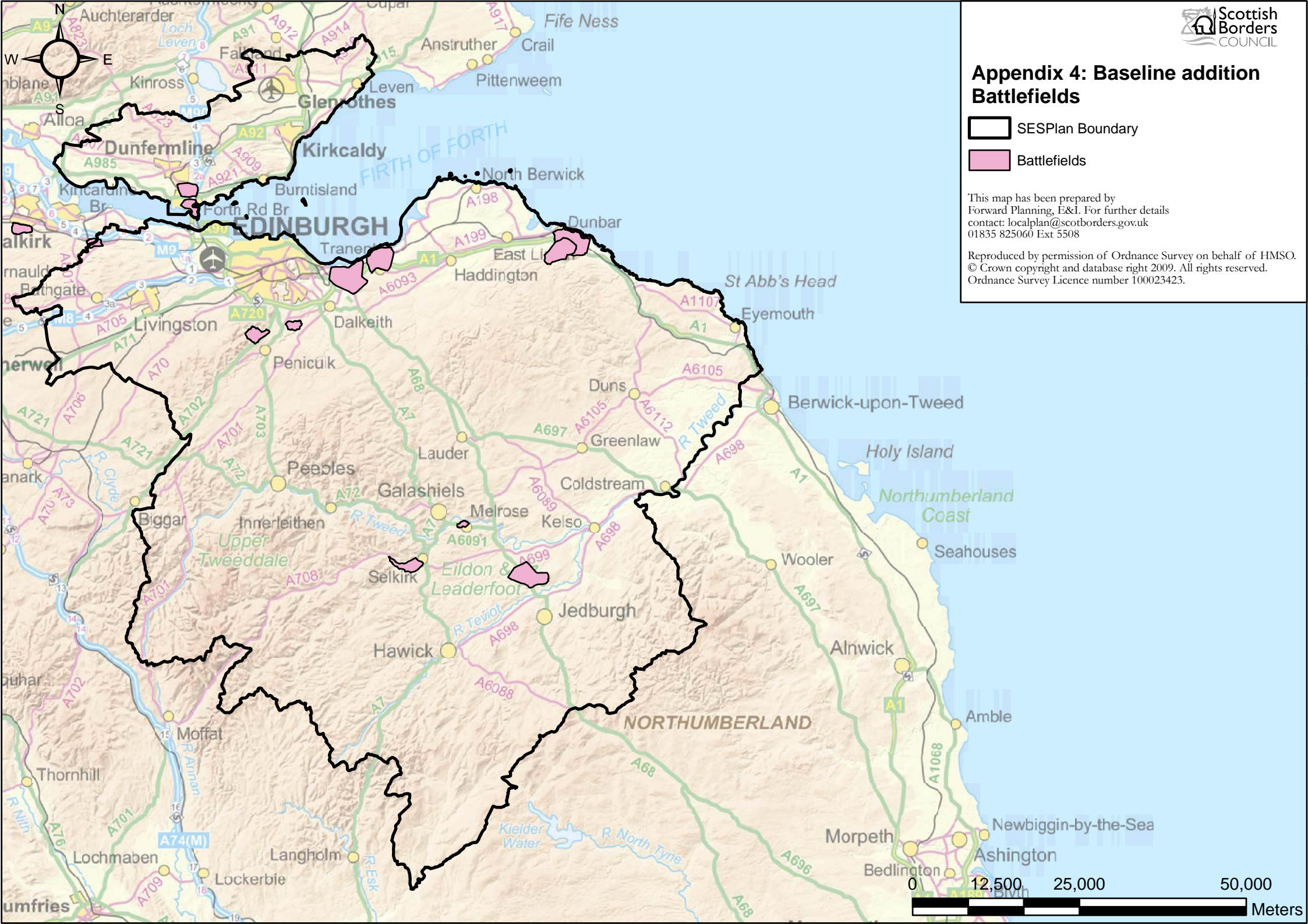


## Appendix 4: Baseline addition Battlefields

-  SESPlan Boundary
-  Battlefields

This map has been prepared by  
Forward Planning, E&I. For further details  
contact: localplan@scotborders.gov.uk  
01835 825060 Ext 5508

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**Summary of SESplan Draft Housing SG Environmental Report Responses**

<b>Respondent: SNH</b>		
<b>Summary of response received</b>	<b>SESplan response</b>	<b>Action to be taken</b>
<p><u>Design Led Approach: strategic approach</u></p> <p>The SG should set the strategic principles for the design-led approach in the SESplan area, setting the framework for further local and site specific detail in LDPs. Paragraph 36 of the draft revised SPP is clear that this is an ‘all levels’ approach to placemaking</p>	<p>Development principles are already set and approved in Policy 1B of SESplan. In addition, Policy 5 of SESplan states “Supplementary guidance will be prepared to provide detailed further information for Local Development Plans as to how much of that requirement should be met in each of those six areas, both in the period 2009-2019 and...2019-2024”. The Draft SG on housing land therefore has a tight focus to provide additional information in support of SESplan policy 5 (Housing Land). As a result the document is purely concerned with the housing needs and demand of the SESplan area. It is considered changes to strategic level policy, such as the design-led approach, which is an emerging requirement in Scottish Planning Policy 2, should be discussed for inclusion in SESplan 2 and/or LDPs.</p>	<p>Development of the design-led approach should be discussed for inclusion in SESplan 2 and/or LDPs.</p>
<p><u>Central Scotland Green Network</u></p> <p>ER notes under such topics as ‘Air/Climatic factors’ could be addressed by “locating these areas <u>close</u> to the CSGN” This is a slightly misleading proposal as the component local authority areas (excluding Scottish Borders) are <u>within</u> the CSGN. We believe that what is meant</p>	<p>It is agreed that the wording can be changed in the updated Environmental Report to reflect allocations being “associated with strategic and local green networks within the CSGN area”</p>	<p>Insert the changes as described under the SESplan response column at the appropriate places in the Updated Environmental Report</p>

<p>here is that allocations should be associated with strategic and local green networks within the CSGN area</p>		
<p><u>SEA Objectives: Biodiversity</u></p> <ul style="list-style-type: none"> <li>- The CSGN work plan is identified as a whole...we suggest that milestones and actions under work plan item 'A5 A Place for Nature' are most relevant.</li> <li>- SNH site condition monitoring only covers SSSI, very few of which are in locations likely to be impacted by development pressures. This does not therefore form a useful tool for monitoring SESplan...Local Biodiversity and Geodiversity (LBS and LGS) are more likely to be affected by development pressures, as are European Protected Species (EPS). Monitoring these, along with developments involving woodland loss may give a more useful indication of how development pressures are affecting biodiversity</li> <li>- while ancient woodland designations themselves will inform monitoring of loss, a more complete understanding of woodland change could be achieved by referring to the Native Woodland Survey of Scotland (NWSS)</li> </ul>	<ul style="list-style-type: none"> <li>- Agreed that the CSGN work plan reference should be changed</li> <li>- It is considered that the uncertainty over the precise location of housing means that it is worthwhile keeping site condition monitoring in. It is accepted that monitoring of LBS and LGS, as well as European Species, would be appropriate to add.</li> <li>- It is considered that ancient woodland could be added to by incorporating the Forestry Commission NWSS into the monitoring framework</li> </ul>	<ul style="list-style-type: none"> <li>- Incorporate a change to refer to work plan item 'A5 A Place for Nature' over the whole CSGN work plan within the Updated Environmental Report</li> <li>- Keep site condition monitoring in the Updated Environmental Report and add monitoring of LBS, LGS and European Species</li> <li>- Add the NWSS into the monitoring framework</li> </ul>
<p><u>SEA Objective: Climatic Factors</u></p> <p>AS the CO<sub>2</sub> emissions for the transport sub-objective are linked to public transport, and presumably also to active travel, it may also be</p>	<ul style="list-style-type: none"> <li>- It appears from examination of the cycle counters proposal that only one location in Edinburgh has the counters deployed</li> </ul>	<ul style="list-style-type: none"> <li>- Incorporate SEStran mode share targets and region wide measures into Table 5 SEA Objectives</li> </ul>



<p>useful to monitor this objective by modal share. Sustrans has recently announced 'Danish-style' cycle counters for Scotland which may assist this monitoring</p>	<p>and therefore it is not an adequate monitor for the SESplan area.</p> <ul style="list-style-type: none"> <li>- However it is considered that SEStran mode share targets and region wide measures would be appropriate monitoring data</li> </ul>	
<p><u>SEA objectives: Landscape and Townscape</u></p> <ul style="list-style-type: none"> <li>- As the SEA proposes applying the design-led approach as a means of mitigating impacts, the monitoring proposals under this topic should be reviewed. It may be useful to consider the six qualities of positive placemaking set out in paragraph 37 of the draft revised SPP</li> <li>- Monitoring via landscape review documents and conservation area statements provide information on a point in time on specific areas. As the SEA objective is to '...protect the landscape and townscape within the SESplan area...' the monitoring should take a wider scope, including the Edinburgh green belt</li> </ul>	<ul style="list-style-type: none"> <li>- It is considered more effective to monitor through reference to the entire design rather than trying to monitor through 6 separate elements. It is noted that p50 of the Policy Statement on Architecture and Place refers to the development of a Place Standard Assessment tool which could be used to monitor design in the SESplan area in the future.</li> <li>- In addition there is also reference to a Masterplanning toolkit for design in town centres. This could also be used to monitor development in SESplan town centres in the future.</li> <li>- It is considered that Local Authority landscape review documents and conservation area statements are the best gauge to monitor protection of the designated landscape and settlements. These documents are reviewed and could include greenbelt and other types of designation</li> </ul>	<ul style="list-style-type: none"> <li>- No action necessary for the Updated Environmental Report</li> <li>- SESplan2 should be aware of ongoing work on design as a result of the Policy Statement on Architecture and Place.</li> </ul>

<p><u>SEA objectives: Population and Human Health</u></p> <p>The monitoring for sub-objectives related to access to greenspace and footpath and cycle routes is based on provision and distance to these. While this is relevant to the sub-objective, the omission of access from the monitoring criteria could mean that the sub-objective is not met. For example, a new development may be a nominal distance from a green network but that benefit is reduced if it is not also accessible</p>	<ul style="list-style-type: none"> <li>- It is agreed that a change to the monitoring criteria is necessary to reflect accessibility to usable designated open space and/or the green network</li> </ul>	<ul style="list-style-type: none"> <li>- Change the monitoring for Population and Human Health to read Accessibility to designated green network and/or open space</li> </ul>
<p><u>SEA objectives: Soil</u></p> <ul style="list-style-type: none"> <li>- The use of Urban Capacity Studies...is a little unclear. Para 8.1 emphasises the focus of Urban Capacity Studies on previously developed land. As the other monitoring tools are vacant and derelict land and areas of contaminated land, there could be a substantial overlap in scope of monitoring.</li> <li>- The scope of monitoring also omits the loss of prime agricultural land and peat-rich soils to additional allocations as the focus is on previously developed, windfall sites</li> </ul>	<ul style="list-style-type: none"> <li>- Vacant and derelict land audits do feed into urban capacity studies however it is considered there is merit in having both as monitoring tools as ultimately the two processes can provide different information</li> <li>- Monitoring of the loss of prime agricultural land and peat-rich soils should be added</li> </ul>	<ul style="list-style-type: none"> <li>- No change required for the Updated Environmental Report</li> <li>- Insert land capability for agriculture classification maps and peat rich soil maps</li> </ul>
<p><u>Assessment findings</u></p> <p>para 4.8 states that the assessment for Biodiversity, flora and fauna is neutral, noting that an HRA will be required to further assess any implications for European Sites. As this work is to be completed, the assessment at this point</p>	<ul style="list-style-type: none"> <li>- The HRA is now at a stage where it has been asserted that there will be no likely significant effects on the site integrity of any European Site as a result of the proposals in the Draft SG. The neutral</li> </ul>	<ul style="list-style-type: none"> <li>- Update the wording at Para 4.8 and other appropriate parts of the document</li> </ul>

<p>should...concluded that impacts are unknown</p>	<p>assessment is considered appropriate, given a wording update at para 4.8 to reflect the HRA progress</p>	
<p><u>Measures envisaged for prevention, reduction and offsetting significant adverse effects:</u> <u>Air/Climatic Factors</u></p> <p>“There should be consideration of measures to alleviate pressure at key routes into/around Edinburgh” is not itself a measure that will reduce/prevent/offset. Instead, we suggest that this measure is linked into the move towards sustainable transport and modal shift to public transport and active travel.</p>	<ul style="list-style-type: none"> <li>- This statement should be better articulated to link towards sustainable transport and modal shift as suggested</li> </ul>	<ul style="list-style-type: none"> <li>- Alter Table 7 ‘Measures to reduce/prevent/offset’ for the Soil SEA topic to state ‘measures to promote modal shift to sustainable transport and the development of sustainable transport routes and infrastructure should be promoted</li> </ul>
<p><u>Measures envisaged for prevention, reduction and offsetting significant adverse effects:</u> <u>Landscape and Townscape</u></p> <ul style="list-style-type: none"> <li>- “The SSA should prevent development being located where there is the risk of adverse effects on landscape designations” is a reasonable measure to include...however...this measure should be widened to include adverse effects on landscape and settlement setting</li> <li>- “Allocation of land should be guided by a</li> </ul>	<ul style="list-style-type: none"> <li>- The statement in the Measures to reduce/prevent/offset column could be widened to better reflect the ‘Issue Identified’ column of Table 7 in the Environmental Report which states “development of additional allocations on greenfield land on the setting and surrounds of settlements in the SESplan area</li> <li>- The wording should be better articulated</li> </ul>	<ul style="list-style-type: none"> <li>- Incorporate the wording “wider landscape and settlement setting” into the Landscape &amp; townscape row and Measures to reduce/prevent/offset column</li> <li>- Change the wording to state “Allocation</li> </ul>

<p>design-led approach i.e. landscape character/landscape capacity studies/masterplanning/development frameworks' sets out the process but does not consider 'how' the design-led approach will help to reduce/prevent/offset the impact of additional allocations. Of the positive placemaking qualities set out in relation to the design-led approach in the draft revised SPP, 'Distinctive' will be particularly important in achieving this measure. This quality included design of places that complement local landscapes, topography, ecology and natural features</p>	<p>to reflect how impacts of development of additional allocations on the setting and surrounds of settlements should have a positive impact.</p>	<p>of land should provide places that are distinctive, in line with the Designing Places document, in that they positively respond to the wider landscape context in which they are situated"</p>
<p><u>Appendix 2 Relevant Plans, Policies and Strategies</u></p> <p>...include Scottish Government's 'Creating Places' policy statement in this Appendix</p>	<p>- The document can be added to the Appendix</p>	<p>- Add the document to the appendix</p>
<p><b>Respondent: SEPA</b></p>		
<p><u>Flood Risk and Water Management</u></p> <ul style="list-style-type: none"> <li>- There is a risk of flooding in the SESplan area from surface water, in itself or in combination with other sources of flood risk. Sec 4...neatly identifies single issues associated with flood risk and water management. The SG could usefully be developed to explore these issues more fully</li> <li>- "Overall it is considered that although there is the potential for negative impacts, it must be considered that legislation and Local Authority work at the LDP level will prevent</li> </ul>	<ul style="list-style-type: none"> <li>- It is assumed that "single issues" refers to each Table for the respective SDAs, which discuss impacts on the water environment from flood risk and management and that the statement "The SG could usefully be developed to explore these issues more fully" is closely aligned to the following point related to an SFRA for the SESplan area.</li> <li>- It is considered unlikely that the allowances in the SDAs will lead to</li> </ul>	<ul style="list-style-type: none"> <li>- No action with regards to the Draft SG but identification of a possible need for further discussion regarding SESplan wide flood risk work for SESplan 2</li> </ul>

<p>negative impacts occurring”. We would question the assumptions that lead to this conclusion...We have advised on the need for a SFRA to inform the Plan and the SEA...It remains our concern that allocations made in the absence of a SFRA, SESplan could allocate land in local authority planning areas which the LDP may not be able to deliver because of the need to avoid flood risk...this raises questions over the effectiveness of the SG, the effectiveness of SESplan</p> <ul style="list-style-type: none"> <li>- Para 4.18 (soil sealing from development on greenfield land)...It is our view that especially where the SG allocates strategic development sites that the ER should identify opportunities for strategic mitigation for the loss of land to ‘soak up’ water. Such opportunities include identifying compensatory storage opportunities in the development of the CSGN and the need and opportunities to develop strategic SUDS...</li> </ul>	<p>exacerbation of flood risk either where development takes place or elsewhere as the precise location of the housing within the SDA will be decided by local authorities and they will undertake appropriate flood risk analysis. Work on LDPs, including flood risk work, has informed the setting of the housing requirements in the Supplementary Guidance. This is why the assessment was decided to be neutral.</p> <ul style="list-style-type: none"> <li>- The SG does not allocate “strategic development sites” as suggested nor does it contain the required level of detail to allow for the identification of opportunities for strategic mitigation for the loss of land to ‘soak up’ water in terms of particular sites. This would need to be done at LDP level, which is in line with Policies 11 ‘Delivering the Green Network’ and 15 ‘Water and Flooding’ in the approved Strategic Development Plan. However text could be added to Table 7 Measures envisaged for the prevention, reduction &amp; offsetting of any significant adverse effects</li> </ul>	<ul style="list-style-type: none"> <li>- Insert row into Table 7 under SEA Topic ‘Water’ and under ‘Issues Identified’ add “Soil sealing within the SESplan region due to the development of greenfield land and impact on flooding incidents through run-off and loss of soak away land”, under ‘Measures to reduce/prevent/offset’ add “identification of compensatory storage opportunities; identification of areas of strategic SUDS areas including within the CSGN; and identification of vulnerable areas”</li> </ul>
<p><u>Soil</u></p> <p>Para 4.14 (mitigation measures of impacts on the Soil SEA topic)...We would like this ER, however, to consider options for a SDP scale of strategic mitigation. This could simply be to identify sites</p>	<ul style="list-style-type: none"> <li>- Policy 5 of SESplan states that “Supplementary guidance will be prepared to provide detailed further information for Local Development Plans</li> </ul>	<ul style="list-style-type: none"> <li>- No action in the Updated Environmental Report to do with identifying large scale strategic greenfield sites. As it is considered this could only be done at LDP</li> </ul>

<p>for large scale greenfield sites, such as SE Edinburgh, where issues with surface water and the need for a strategic approach to SUDs have been identified or to set out the criteria by which the need for a strategic approach to SUDs can be assessed</p>	<p>as to how much of that requirement should be met in each of those six areas, both in the period 2009-2019 and...2019-2024". The Draft SG on housing land therefore has a tight focus to provide additional information in support of SESplan policy 5 (Housing Land).</p> <ul style="list-style-type: none"> <li>- If work on large scale greenfield sites and strategic mitigation was to take place it would require to be done at the LDP level, this is because it is the local authorities who decide where housing land and in what form will be allocated within the SDAs and area areas outwith SDAs</li> <li>- Wording has been added to Table 7 for the Water SEA topic, referring to an issue to do with soil sealing and impact on flooding incidents. This wording is described at p8 under the Flood Risk and Water Management heading.</li> </ul>	<p>level.</p> <ul style="list-style-type: none"> <li>- Insert row into Table 7 under SEA Topic 'Water' and under 'Issues Identified' add "Soil sealing within the SESplan region due to the development of greenfield land and impact on flooding incidents through run-off and loss of soak away land", under 'Measures to reduce/prevent/offset' add "identification of compensatory storage opportunities, including within the CSGN (LDP level); identification of areas of strategic SUDs areas (LDP level); and identification of vulnerable areas"</li> </ul>
<p><u>Appendix 3: Detailed Assessments. Table 5: Scottish Borders. Water"</u></p> <p><i>(Table states that the River Tweed, as a water environment, has a significant policy and legislation framework which prevents adverse impacts. As a result a neutral assessment is considered appropriate)</i></p> <ul style="list-style-type: none"> <li>- There is a legislative framework to protect the Tweed but if this is taken into account it could mean allocations cannot be taken forward and this raises the risk of making the</li> </ul>	<ul style="list-style-type: none"> <li>- This is not considered to be the case as the Scottish Borders LDP is at the period of representations stage with the intention that no further land is allocated</li> </ul>	<ul style="list-style-type: none"> <li>- Update the wording of Table 5 Scottish Borders- Water to reflect the position of the Borders LDP</li> </ul>

<p>allocation ineffective</p> <ul style="list-style-type: none"> <li>- A neutral or even a positive assessment is only really possible if the allocations have been tested against or aligned with the RBMP objectives for the Tweed</li> <li>- It is unclear from the ER to what extent the RBMP has been taken into account both in the SG and in the ER for all allocations in the SG</li> </ul>	<p>for housing as a result of the Draft SG. Of the allocations taken forward none are considered ineffective due to impacts on the River Tweed. The wording could be updated to reflect the position of the Borders LDP</p> <ul style="list-style-type: none"> <li>- The Scottish Borders Environmental Report which includes assessment of the housing included in the Draft SG concludes a neutral impact on the Water SEA topic and it is stated that the Council will pursue the conservation and enhancement objectives of the RBMP, as well as natural flood management. SEPA have accepted this assessment in their response to the document. The wording could be updated to reflect the position of the Borders LDP</li> <li>- In the relevant PPS section the RBMPs for the Scotland River District and the Solway Tweed District are included and it is stated that the Draft SG proposals should avoid deterioration of the water environment. It is also the case that in the detailed assessment for each local authority the RBMP objectives are mentioned where it is considered relevant. This could be mentioned in the summary paragraph at 4.15. The SEA objectives are also reflective of the RBMP, although the document is not mentioned</li> </ul>	<ul style="list-style-type: none"> <li>- Update the wording of Table 5 Scottish Borders- Water to reflect the position of the Borders LDP</li> <li>- Add wording to the summary paragraph at 4.15 to state that the relevant RBMPs and their objectives have been considered.</li> <li>- Add reference to the RBMP at Table 5 SEA objectives</li> </ul>
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	explicitly and it could be added to the wording at Table 5 SEA objectives	
<u>Appendix A Baseline Report</u> <ul style="list-style-type: none"> <li>- It is SEPA's view that one element of the CSGN as 'multi-functional place-making' is its potential role as part of a strategic approach to compensate for water storage lost when soil is sealed by development. The ER could elaborate on this aspect of CSGN to identify opportunities to mitigate negative impacts across the SESplan area</li>   <li>- There is possibly a slight misunderstanding about flood risk throughout the ER. Avoiding flood risk is not simply a case of avoiding new development in areas likely to flood. There is also a requirement to avoid developing where it may increase the risk of flooding elsewhere</li> </ul>	<ul style="list-style-type: none"> <li>- As previously stated Policy 5 of the SESplan makes clear that the Draft SG is purely concerned with the requirement of housing numbers in the 6 member local authority areas in the periods 2009-1029 and 2019-2024.</li> <li>- It is therefore considered that identification of opportunities to mitigate negative impacts across the SESplan area is not appropriate within this SEA but could be explored at the LDP level, which is in line with SESplan Policy 11 'Delivering the Green Network'</li> <li>- Under Flood Risk and Water Management (p8 above) the potential for the CSGN to compensate for water storage lost has been introduced to the environmental assessment.</li>   <li>- No specific examples are given of this misunderstanding but references to flood risk will be checked and updates made where it is considered necessary</li> </ul>	<ul style="list-style-type: none"> <li>- Table 7 'Measures envisaged for the prevention, reduction &amp; offsetting of any significant adverse effects' has been amended at the 'Water' row to include 'Identification of compensatory storage opportunities, including within the CSGN (LDP level)'</li>   <li>- Updates to references to flood risk can be made where necessary</li> </ul>
<u>Air Quality</u>		



<ul style="list-style-type: none"> <li>- 4.7. “The assessments under the Air topic are mainly neutral, in all areas it is anticipated that additional car journeys and short-medium term construction projects will bring a negative effect. In East Lothian and Fife it is considered that there is a risk of minor negative effects from the additional allocations because of the increased air emissions on already congested routes”</li> <li>- There appears to be a contradiction in this section which recognises that there will be a negative impact on air quality but which concludes that assessments of allocations are mainly neutral. This section should be clarified.</li> <li>- East Lothian and Fife are not the only parts of the SESplan area with congested routes...it is another reason to re-visit this topic area, both in this section and throughout the ER with attention given to some examples of what additional emissions would tip the balance to creating AQMA and what level of additional traffic, even from a small allocation, would create those additional emissions</li> </ul>	<ul style="list-style-type: none"> <li>- It is agreed that the wording in paragraph 4.7 is unclear and that the assessment could be revisited. As a result paragraph 4.7 will change to summarise the revised assessment findings and the detailed assessments for each local authority at Appendix 3, with regards to ‘Air’ will also be edited where appropriate.</li> <li>- It is considered that the scale of additional allocations is important, there is a large degree of uncertainty because of the size of the SDAs, the limited number of housing and the time involved for the housing to come forward.</li> <li>- It is accepted there are other busy routes within the SESplan area but this must be balanced with the provision of public and sustainable transport links and the proximity to services, employment and other destinations.</li> </ul>	<ul style="list-style-type: none"> <li>- Overall the assessment does not change in terms of identified negative and neutral impacts on the SEA topic for each local authority area. However the reasoning of the assessment is now more robust and a number of revisions have been made in the Summary section at paragraph 4.7 (and a new paragraph 4.8) and at Appendix 3 for each respective local authority.</li> </ul>
<p><u>Appendix 3: Detailed Assessments. Table 5: Scottish Borders. Air”</u></p> <ul style="list-style-type: none"> <li>- Table 5: Scottish Borders. Air. “These net changes ... As a result a neutral impact is considered appropriate as there are measures to avoid increased emissions from car journeys.” A note of caution is advised in</li> </ul>	<ul style="list-style-type: none"> <li>- The Borders Proposed LDP has been subject to SEA and the allocations (which include the additional requirement identified in the Draft SG) have been assessed as to their impact on the Air SEA</li> </ul>	<ul style="list-style-type: none"> <li>- Revisions have been made to paragraph 4.7 and at the relevant part in Table 5 of Appendix 3 to better reflect the Scottish Borders Proposed LDP assessment</li> </ul>

<p>making this assumption. It cannot be assumed that the number of car journeys by train will be equal to or greater than the increase in car journeys occasioned by additional allocations, and, therefore, a neutral effect cannot be assumed.</p> <ul style="list-style-type: none"> <li>- It should be kept in mind that rail travel is not neutral in terms of emissions, green house gases and other effects. This may not lead to a negative effect on local air quality but it does make a contribution to climate change.</li> </ul>	<p>topic. No negative impacts were found largely because of the proximity of the allocations to town centres and sustainable transport links. It was also considered that the limited size of the allocations and the high air quality were pertinent factors</p> <ul style="list-style-type: none"> <li>- This was not made clear in the original Environmental Report for the Draft SG and so revisions have been made to paragraph 4.7 and at the relevant part in Table 5 of Appendix 3.</li> </ul>	
<p><u>Climate Change (mitigation and adaptation)</u></p> <p>It would be helpful if the ER was more explicit about the distinction between mitigating climate change and adapting to climate change. Not building in an area which may flood due to climate change, for instance, is adaptation to climate change it is not mitigation of climate change</p>	<ul style="list-style-type: none"> <li>- Relevant sections can be looked at to try and make the distinction clearer</li> </ul>	<ul style="list-style-type: none"> <li>- Look at relevant sections and make changes as necessary</li> </ul>
<p><u>Appendix A Baseline Report. Paragraph 7.7: “The Zero Waste Plan aims to deliver a ‘zero waste Scotland over the next 10 years’</u></p> <p>The ER could identify initiatives in the SESplan area to use waste as a resource, for example Fife Council’s Heat Map. These initiatives could be assessed to identify beneficial outcomes from the SG, for instance, housing allocations aligned with Fife Council’s Heat Map, combined with guidance or advice on linking new housing with opportunities for heat and energy from waste.</p>	<ul style="list-style-type: none"> <li>- The Draft SG has a tight focus on meeting the requirement for housing (as a requirement from SESplan Policy 5 ‘Housing Land’) and as a result it is considered that work to identify initiatives to use waste as a resource and to provide strategic policy direction on linking new housing with opportunities</li> </ul>	<ul style="list-style-type: none"> <li>- Put forward use of waste as a resource and linkages to new housing to opportunities for energy from heat and waste to be considered at SESplan 2 level</li> </ul>

	for heat and energy from waste, are more appropriately considered at SESplan 2 level	
<p><u>Additional Points</u></p> <ul style="list-style-type: none"> <li>- At certain points in the ER there seems to be an overlap with the requirements of the Habitats Regulations. Although there are useful benefits in combining work, where possible, on SEA and Habitats Regulations Appraisals, the appraisals need to be kept separate.</li> <li>- There are a number of references in the ER to a design-led approach. We support this approach and want to engage, as partners, in developing it and helping to take allocations through it to implementation. We believe that issues we have raised in this letter, such as strategic SUDS, should be addressed as central to design: we believe this not only because adequate SUDS are of importance to SEPA, but because when SUDS, for instance, are required and they have not been taken into account at the earliest stages of design they could compromise other elements of the design.</li> </ul>	<ul style="list-style-type: none"> <li>- No specific example of this is given and it must be assumed that the Biodiversity, flora and fauna assessment paragraph (4.8) is what is being referenced. It is considered that this reference is needed because European Protected Species are critical to the biodiversity of the SESplan area. The statement has been updated to reflect further work completed on the HRA</li> <li>- Reference to strategic level SUDS has been dealt with under the Water topic at p8 above.</li> <li>- It is hoped that a strategic design-led approach can be articulated through the development of SESplan 2</li> </ul>	<ul style="list-style-type: none"> <li>- No further action required</li> <li>- No further action required</li> </ul>

Respondent: Historic Scotland		
<u>Current state of the environment</u>		
<p>...it is important that historic battlefields be taken into account</p>	<ul style="list-style-type: none"> <li>- the original baseline is being retained due to the parallels between the SESplan Updated Environmental Report and the Draft SG SEA process. However a map can be produced showing the relevant sites and inserted as an appendix to the Updated Environmental Report</li> </ul>	<ul style="list-style-type: none"> <li>- Produce a map showing the relevant battlefield sites and insert it into the relevant part of the Updated Environmental Report (Appendix 4)</li> </ul>
<u>Monitoring indicators</u>		
<p>Under Cultural Heritage, it is stated to 'avoid adverse impacts on Conservation Areas and the historical heritage of the SESplan area'. We would question why Conservation Areas in particular have been identified over other historic environment assets...a similar statement to that of Landscape and Townscape may be more appropriate, for example, 'avoid adverse impacts on the site and setting of historic environment assets within the SESplan area'</p>	<ul style="list-style-type: none"> <li>- It is agreed that a more general statement would be more appropriate which refers to other aspects of Cultural Heritage</li> </ul>	<ul style="list-style-type: none"> <li>- Amend the wording to state "Avoid adverse impacts on the site and setting of historic environment assets within the SESplan area"</li> </ul>
<u>SEA Objectives</u>		
<ul style="list-style-type: none"> <li>- We would recommend the use of monitoring indicators that better reflect the outcome of the SG/Plan, such as, <i>'the number and outcome of planning applications where significant effects on the historic environment have been identified'</i>.</li> </ul>	<ul style="list-style-type: none"> <li>- It is agreed that the monitoring indicators could be better reflective of the outcomes of the SG</li> </ul>	<ul style="list-style-type: none"> <li>- The monitoring indicators should be changed to look at the number and outcome of planning applications with significant effects on- listed buildings; scheduled monuments; world heritage sites; designed gardens and landscapes; and buildings at risk</li> </ul>

<ul style="list-style-type: none"> <li>- Additionally you may wish to consider a review of effects upon the historic environment in delivering the SG/Plan through the LDPs that looks at themes and issues in a narrative format.</li> </ul>	<ul style="list-style-type: none"> <li>- It is considered that effects are discussed in the detailed assessment for the respective local authority areas</li> </ul>	<ul style="list-style-type: none"> <li>- No further action necessary</li> </ul>
<p><u>Assessment of environmental effects</u></p> <ul style="list-style-type: none"> <li>- ...commentary would appear to indicate that the potential for negative and positive effects on Cultural Heritage would cancel each other out resulting in a neutral prediction. We would question this approach and would highlight that in the case of this SG, there would appear to have been no spatial assessment of potential effects undertaken. Relying on a design-led approach and application of policy at the LDP level may not be able to achieve a position of neutral effects for cultural heritage...we would suggest that the effects are more likely to be unknown or potentially negative taking into account the fact that the SG relates to significant housing land allocations which will likely has a greater potential for negative effects on historic environment assets than positive</li> <li>- ...we would also emphasis the need to consider the suitability of housing land allocations in relation to cultural heritage prior to the masterplanning stage</li> </ul>	<ul style="list-style-type: none"> <li>- It is accepted that the assessments in Appendix 3 regarding Cultural Heritage, with respect to the member Local Authorities can be revisited. As a result this will change the summary paragraph at Section 4 of the Updated Environmental Report.</li> <li>- It is considered that although the impression of a trade-off in the existing assessment was not the intention, it was the case that it was felt that the requirement for the SESplan area which was been assessed could have a neutral impact because at the LDP level, where the housing is allocated, there would be a need to adhere to SESplan Policy 1B 'Spatial Strategy: Development Principles' which states that LDPS will ensure "that there are no significant adverse impacts on the integrity of international and national built or cultural heritage sites...". When a design-led approach was considered on top of this it was considered a neutral impact was possible</li> <li>- The assessment should have been more</li> </ul>	<ul style="list-style-type: none"> <li>- The assessments for the respective Local Authorities should be revisited and a change in the score considered. Then Section 4, the summaries, should be updated, if necessary.</li> <li>- Further justification of the assessment process should be added to provide better evidence and make the assessment clearer</li> </ul>

	clear on this reasoning	
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**APPENDIX E**      Habitats Regulations Assessment

**SESplan Housing Supplementary Guidance**

**HRA Record**

**February 2014**



## 1. Introduction

- 1.1 The purpose of this HRA record is to assess whether the proposals contained within the SESplan Housing Supplementary Guidance (herein referred to as the 'SG') will cause likely significant effects (LSE) on the conservation objectives of European Sites in and outwith the SESplan area.
- 1.2 The SG has been prepared to provide detailed further information in support of SDP Policy 5 Housing Land. The further information will provide direction for Local Development Plans (LDP) as to how much of the overall housing land requirement should be met in each of the six member authority areas (City of Edinburgh, East Lothian, Fife, Midlothian, Scottish Borders and West Lothian).
- 1.3 An HRA was undertaken for the SESplan Proposed Plan and, following approval of the SESplan, Scottish Ministers agreed that there was no need to update this HRA in light of changes made to the document.
- 1.4 However it is considered that for this SG that a further HRA is required, for the reason that the previous HRA reached an end point following SESplan approval, but also because the SG introduces the potential for significant change with regards to phasing and the distribution of housing requirements that should be assessed. It is considered that this approach is confirmed by the 'Procedural requirements of the Habitats Regulations' as stated in the 'Guidance for Plan-Making Bodies in Scotland Version 2' (2012: 2).

## 2. Methodology of the SG

- 2.1 It is stated within the SG that "...there is a requirement for a total of 155,544 houses to be provided over the period to 2032. This total requirement as identified by the Housing Needs Demand Assessment...is to be distributed across the three SDP plan periods 2009-2019 (74,345 houses), 2019-2024 (32,710) and 2024-2032 (47,999).
- 2.2 In order to identify sufficient land to meet this requirement a Technical Note has been produced which reviews the original Spatial Strategy Assessment in terms of analysing opportunities and environmental and infrastructure capacities and constraints. Relevant to this HRA record is the fact that no Strategic Development Areas (SDA) are located *on* European Sites.
- 2.3 In addition, in setting out the housing land requirement, the SG must be consistent with the spatial strategy in the approved SESplan meaning additional allowances should be directed to brownfield land as a priority, as well as being located within identified SDAs. However, the Technical Note analysis does not result in any further significant brownfield housing opportunities being identified and this means that additional land outwith SDAs will have to

be allocated in LDPs. Areas outwith SDAs are therefore identified at City of Edinburgh, Fife and the Scottish Borders.

2.4 The respective local authorities are at different stages of Local Development Plan production and therefore this must be taken cognisance of in this HRA. For example, Scottish Borders has already identified housing to meet any additional requirement identified in the Housing SG and this is therefore covered in the Scottish Borders Proposed Plan HRA.

2.5 SESplan Policy 7 'Housing Land Development Outwith Strategic Development Areas' states that greenfield land identified in Local Development Plans may be permissible for housing where criteria are also met. The criteria would ensure the development is in keeping with the character of the settlement and the local area; would not compromise green belt objectives; and additional infrastructure required would be either committed or funded by any developer. The Supplementary Guidance states that "LDPs will include a detailed assessment of the amount of housing land to be allocated outwith SDAs and consideration of potential sites" (para 3.10 p6: 2013).

2.6 The SG is therefore required to establish how the housing requirement as identified in the HNDA will be distributed within the two time periods, 2009-2019 and 2019-2024, amongst the six local authority areas. The precise requirement is 107, 545 units (74,840 in the period 2009-2019 and 32,720 in the period 2019-2024). The SG identifies that based on a 2012 Housing Land Audit the total supply across the SESplan area to 2024 is 83,207 units and as a result to meet the requirement of 107,545 units by 2024 LDPs will have to identify land to accommodate an additional 24, 338 units.

2.7 The Proposed Plan identified 10,150 units in addition to the committed development. As part of the assessment of opportunities and infrastructure and environmental capacities and constraints, it was identified that the developments that made up those additional units were still appropriate and in accordance with the approved SDP. Therefore there was a need to identify capacity to:

- set housing requirements to meet the overall SESplan requirement; and
- meet the shortfall between the revised established land supply and the housing requirements.

2.8 Table 1 below sets out the additional allowances that will make up that shortfall by SDA and area outwith SDA:

<b>Table 1: Proposed Plan and Supplementary Guidance Additional Allowances</b>					
<b>SDA</b>	<b>2009-2019 Proposed Plan</b>	<b>2019-2024 Proposed Plan</b>	<b>Proposed Plan total (2009-2024)</b>	<b>SG additional identified requirements</b>	<b>SG total requirements</b>
W Edin	1000	1000	2000	700	2700
SE Edin	600	850	1450	1500	2950
<i>Of which:</i>					
<i>Edin</i>	(500)	(500)	(1000)	(1500)	(2500)
<i>Midlothian</i>	(100)	(350)	(450)	(0)	(450)
Central Edin	0	0	0	0	0
Edin Waterfront	0	0	0	0	0
Outwith Edinburgh SDA	0	0	0	2500	2500
East Lothian	0	750	750	2810	3560
Eastern Borders	0	50	50	110	160
North Dunfermline	0	500	500	2130	2630
Ore/Upper Leven	0	500	500	2720	3220
Outwith SDAs (Fife)	600	200	800	1150	1950
A7/A68/Borders Rail	350	900	1250	100	1350
A701 Corridor	250	500	750	0	750
Central Borders	0	200	200	90	290
Western Borders	0	100	100	10	110
Outwith SDAs (Borders)	0	50	50	30	80
West Lothian	500	1250	1750	380	2130
		<b>Totals</b>	<b>10150</b>	<b>14230</b>	<b>24380</b>

2.9 Table 1 shows that the Housing SG identifies additional allowances of 19,580 units in the SDAs as well as 4,530 units outwith SDAs in the City of Edinburgh, Fife and the Scottish Borders LDP areas.

2.10 For the HRA it is critical to note that the figure of 10,150 units from the Proposed Plan **was** assessed in the Proposed Plan HRA and it is therefore not necessary to assess this figure again. The additional 14,230 units necessary to meet the housing requirements set out in the Supplementary Guidance **was not** assessed in the Proposed Plan HRA and it is this latter figure that the assessment in this HRA should focus on. The remainder of the housing requirement will be met by existing committed development. This will have been allocated in previous plans, already granted permission, or will come from windfall development.

### 3. HRA Methodology

3.1 Due to the limited scope of the changes between the SG and the Proposed Plan this HRA Record should build on the Proposed Plan HRA where appropriate. In doing this, it will allow the assessment that takes place in this HRA Record to be concise and focussed on the net figure of 14,230. The Proposed Plan HRA is contained as Appendix 1 to this HRA.

3.2 With this approach in mind, it is considered that the European Sites identified in the Proposed Plan HRA are the ones that will be used for the assessment in this Record. Appendix 2 provides the details on these sites including the conservation objectives. The sites are:

- Berwickshire & North Northumberland Coast SAC
- Blawhorn Moss SAC
- Firth of Forth SPA/Ramsar
- Forth Islands SPA
- Isle of May SAC
- River Teith SAC
- River Tweed SAC
- St Abb's to Fast Head Castle SAC
- St Abb's to Fast Head Castle SPA
- Whitlaw & Branxholme SAC

3.3 To do this it is considered that a short initial screening can be provided, this is to confirm what SDA and areas Outwith SDA should be scoped out or carried into the HRA. Where there is any uncertainty the SDA or Local Authority area Outwith an SDA will be screened in, this is in line with the precautionary principle.

## 4. Screening

4.1 Table 2 below shows the screening of the SDAs and the three Local Authorities where housing may be located outwith SDAs. The table provides three options for a screening decision: no LSE (screened out), LSE (screened in) and minor residual effect possible (screened in for later in-combination assessment); there is then a column for justification of this decision. Where a decision is to screen out, this has been done in line with the Steps listed in the 'Guidance for Plan-Making Bodies in Scotland Version 2' (2012: 17-20).

Table 2 Screening of SG Proposals		
SDA or local authority area outwith an SDA	LSE (IN)	Justification
	Minor residual effect (IN-in combination)	
	No LSE (Out)	
West Edinburgh		The SDA is screened in because it is considered that the additional 700 units have a link to LSE on the conservation objectives of the Firth of Forth SPA, Forth Islands SPA, Isle of May SAC and the River Teith SAC. This is in line with the links established in the Proposed Plan HRA.
South East Edinburgh		Screening Step 3 c)  At the Proposed Plan stage it was agreed with SNH that there was no possible link to a LSE on the conservation objectives of a European Site from housing in this SDA. It is considered that the additional 1500 do not change this assessment.
Edinburgh City Centre		Screening Step 3 c)
Edinburgh Waterfront		For Edinburgh City Centre and Waterfront SDAs there is no provision for any development and therefore there is no possible link to any European Site
City of Edinburgh		It is considered that the additional 2500 units have a link to LSE on the conservation objectives of the Firth of Forth SPA, Forth Islands SPA, Isle of May SAC and the River Teith SAC.
East Lothian		The SDA is screened in because it is considered that the additional 2810 units have a link to LSE on the conservation objectives of the Firth of Forth SPA, Forth Islands SPA, Isle of May SAC and the River Teith SAC. This is in line with the links

		established in the Proposed Plan HRA.
North Dunfermline		The SDA is screened in because it is considered that the additional 2130 units have a link to LSE on the conservation objectives of the Firth of Forth SPA, Forth Islands SPA, Isle of May SAC and the River Teith SAC. This is in line with the links established in the Proposed Plan HRA.
Ore/Upper Leven Valley		The SDA is screened in because it is considered that the additional 2720 units have a link to LSE on the conservation objectives of the Firth of Forth SPA, Forth Islands SPA, Isle of May SAC and the River Teith SAC. This is in line with the links established in the Proposed Plan HRA.
Fife (Outwith SDAs)		It is considered that the additional 1150 units have a link to LSE on the conservation objectives of the Firth of Forth SPA, Forth Islands SPA, Isle of May SAC and the River Teith SAC.
A7/A68/Borders Rail Corridor		Screening Step 3 c)  The HRA of the Proposed Plan stated that there was no link from the SDA to any European Site and it was screened out as a result. It is considered that the additional 100 unassessed units do not change this initial assessment.
A701 Corridor		Screening Step 3 c)  There is no provision in the Housing SG for additional unassessed units.
Eastern Borders		The Draft SG additional requirement of 110 units is already accounted for in the Scottish Borders Proposed Local Development Plan and has been assessed in the Scottish Borders Proposed Plan HRA. It is therefore unnecessary to assess again in this HRA
Central Borders		The Draft SG additional requirement of 90 units is already accounted for in the Scottish Borders Proposed Local Development Plan and has been assessed in the Scottish Borders Proposed Plan HRA. It is therefore unnecessary to assess again in this HRA
Western Borders		The Draft SG additional requirement of 10 units is already accounted for in the Scottish Borders Proposed Local Development Plan and has been assessed in the Scottish Borders Proposed Plan

		HRA. It is therefore unnecessary to assess again in this HRA
Scottish Borders (Outwith SDAs)		The Draft SG additional requirement of 30 units is already accounted for in the Scottish Borders Proposed Local Development Plan and has been assessed in the Scottish Borders Proposed Plan HRA. It is therefore unnecessary to assess again in this HRA
West Lothian		The SDA is screened in because it is considered that the additional 380 units have a link to LSE on the conservation objectives of the Firth of Forth SPA, Forth Islands SPA, Blawhorn Moss SAC, Isle of May SAC and the River Teith SAC. This is in line with the links established in the Proposed Plan HRA.

4.2 Table 2 results in the following SDA and local authority areas outwith SDA being screened in

- West Edinburgh
- City of Edinburgh (outwith SDA)
- East Lothian
- North Dunfermline
- Ore/Upper Leven Valley
- Fife (outwith SDA)
- Eastern Borders
- Central Borders
- West Lothian

## 5. Applying straightforward mitigation and re-screening

5.1 In agreement with SNH it is considered that the Proposed Plan HRA provides strategic mitigation measures that, if applied to the additional allocations that are not already assessed in the SG, will prevent any adverse effect on the site integrity of any European Site where a link to LSE was established at Screening.

5.2 The Proposed Plan HRA found that there was a link to LSE on all of the European Sites for which a link has been established in the SG. However, it was also stated that the housing proposals left uncertainty over precise impacts and that it was therefore impossible to state

that any of the qualifying interests would definitely not be affected by LSE caused by housing development. The precautionary principle was therefore applied. For the SG additional allowances that have not been assessed it is considered the situation is the same.

5.3 It was therefore considered in the Proposed Plan HRA that broad strategic measures could be identified to help guide lower tier plan HRAs (i.e. LDP HRAs). These strategic measures were:

- Avoidance of development located on the European Sites in question or on land directly associated with the functioning of the site or behaviour of the qualifying interest- *This could be achieved through a spatial strategy or other site assessment process where one of the criteria is avoidance of European Sites*
- Avoidance of development that could create/exacerbate flood risk which may cause direct/indirect adverse effect(s) on site integrity i.e. through mobilisation of sediments/contaminants- *This could be built into any Strategic Flood Risk Assessment and/or born in mind in any site assessment process.*
- Prevent damage of European Sites and disturbance of qualifying interests from recreational users (including dogs) on both land and water- *Minimise additional disturbance through provision in new residential developments for sufficient high quality greenspace with links to the green network*
- Prevent waste water, sewage, pollutants and sediments entering the Forth/River Tweed/North Sea directly or entering waters that lead to the Forth/River Tweed/North Sea- *this can be achieved through promotion of SUDS and avoidance of flood risk through adherence to SEPA and Scottish Water advice*

5.4 It is considered that these broad strategic measures also apply to the overall requirement and additional allowances not assessed in the SG.

5.5 The final conclusion of the Proposed Plan HRA was that further assessment would be required at LDP level to determine the precise nature of any LSE on the conservation objectives of European Sites as a result of the housing proposals. Again this is considered directly relevant to the additional allowances not assessed in the SG, and therefore the same assertion is made here.

5.6 By employing these strategic mitigation measures and providing the additional caveat that LDP level HRA will be required to provide more detailed assessment it is considered that when the SG is re-screened there is no likelihood of significant effects on the conservation objectives of the European Sites identified at Section 3 Methodology.



## **6. Conclusion**

- 6.1 In order to meet the overall housing requirement, the SG presents additional housing allowances in certain SDAs and areas outwith SDA that were not previously assessed in the Proposed Plan HRA. These allowances bring a link to LSE on a number of European Sites.
- 6.2 It was agreed with SNH that the mitigation undertaken in the appropriate assessment of the Proposed Plan HRA was directly relevant to the additional allocations that have not been assessed in the SG. As a result this mitigation was described in the 'Straightforward Mitigation and re-screening' section above with the conclusion that strategic mitigation measures and a caveat of further detailed assessment at LDP HRA level would prevent LSE on the conservation objectives of European Sites identified at Section 3 Methodology.